

# EXHIBIT 8

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

- - -

CORY SPENCER, AN INDIVIDUAL; )  
DIANA MILENA REED, AN )  
INDIVIDUAL; AND COASTAL )  
PROTECTION RANGERS, INC., )  
A CALIFORNIA NON-PROFIT PUBLIC )  
BENEFIT CORPORATION, )

Plaintiffs, )

vs. )

No.: 2:16-cv-02129-SJO  
(RAOx)

LUNADA BAY BOYS; THE INDIVIDUAL )  
MEMBERS OF THE LUNADA BAY BOYS, )  
INCLUDING BUT NOT LIMITED TO )  
SANG LEE, BRANT BLAKEMAN, ALAN )  
JOHNSTON AKA JALIAN JOHNSTON, )  
MICHAEL RAE PAPAYANS, ANGELO )  
FERRARA, FRANK FERRARA, )  
CHARLIE FERRARA, ET AL., )

Defendants. )

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VIDEOTAPED DEPOSITION OF

SANG LEE

COSTA MESA, CALIFORNIA

MAY 31, 2017

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REPORTED BY: ANGELIQUE MELODY FERRIO, CSR NO. 6979

FILE NO: AB05A10

1	you at your home?	09:27:05
2	A. No. I'm at her house.	09:27:07
3	Q. Where does your mother live?	09:27:11
4	A. In Rancho Palos Verdes, also.	09:27:13
5	Q. At what address?	09:27:15
6	A. It's 30341 Camino Porvenir, P-o-r-v-e-n-i-r,	09:27:17
7	and that's Rancho Palos Verdes, California, 90275.	09:27:29
8	Q. Okay. And have you ever been married?	09:27:35
9	A. No.	09:27:50
10	Q. Have you ever been arrested?	09:27:51
11	A. No.	09:27:56
12	Q. Have you ever been convicted of any crimes?	09:27:57
13	A. No.	09:28:01
14	Q. And where did you go to high school?	09:28:04
15	A. P.V. High School, Palos Verdes High School.	09:28:06
16	Q. And did you graduate?	09:28:11
17	A. Yes.	09:28:12
18	Q. In what year?	09:28:13
19	A. '84.	09:28:14
20	Q. And after high school did you attend any	09:28:19
21	college?	09:28:22
22	A. I attended some junior college.	09:28:22
23	Q. Which junior college?	09:28:26
24	A. I believe I went to Marymount for a little	09:28:28
25	bit and then Harbor College. And I might have even	09:28:33

1           A. I think it was -- the last time I did it was 09:32:50  
2 maybe 2014 or something around then. 09:32:56

3           Q. Is that your best estimate? 09:33:01

4           A. Yeah, around then. It was because of 09:33:03  
5 injuries that I stopped. 09:33:06

6           Q. And how long did you practice Jiu-Jitsu 09:33:08  
7 overall? 09:33:12

8           A. I started from 2004, I think. 09:33:12

9           Q. So, about ten years? 09:33:15

10          A. Off and on, uh-huh, about that. I had to 09:33:16  
11 stop I think like '10 or '11 because I got injured. 09:33:20  
12 And then I re-started again. And then I got injured 09:33:24  
13 again and so I stopped. 09:33:27

14          Q. Do you have any tattoos? 09:33:32

15          A. Yes. 09:33:37

16          Q. How many? 09:33:37

17          A. Like, I mean, well, just there are three 09:33:40  
18 separate ones, yeah, three, yeah, three. 09:33:46

19          Q. And where are your three tattoos? 09:33:49

20          A. On my shoulder. 09:33:52

21          Q. Which shoulder? 09:33:53

22          A. Left. 09:33:55

23          Q. And what are they of? 09:33:58

24          A. It says, one of them says Lunada Bay on it. 09:34:01

25          Q. Okay. 09:34:12

1 A. And another one has a rose underneath it. 09:34:12

2 Q. A drawing of a rose as opposed to the word 09:34:16

3 rose? 09:34:21

4 A. Yeah. And next to it, it has a Trident head, 09:34:21

5 like a spearhead. It's kind of like a high school 09:34:25

6 logo, so. 09:34:29

7 Q. And do they go in that order that you just 09:34:38

8 described Lunada Bay, then a rose, then the Trident 09:34:43

9 head or how are they arranged? 09:34:46

10 MR. CROWLEY: Objection, vague. 09:34:48

11 THE WITNESS: I don't know, I mean, you can 09:34:49

12 look at it and see. I don't really know the exact 09:34:52

13 thing. 09:34:56

14 The letter and the rose is underneath. And 09:34:56

15 the Trident head used to be right next to the letter. 09:34:59

16 MS. POOLEY: Are you opposed to having him 09:35:06

17 show me? 09:35:08

18 MR. CROWLEY: I am. I don't think that he 09:35:09

19 needs to disrobe for the deposition. 09:35:11

20 MS. POOLEY: He offered, so, that's why I 09:35:13

21 asked. 09:35:16

22 MR. CROWLEY: I understand. 09:35:16

23 BY MS. POOLEY: 09:35:18

24 Q. Are you a surfer? 09:35:18

25 A. Yeah. 09:35:24

1	breath.	09:50:57
2	BY MS. POOLEY:	09:50:57
3	Q. When you say -- when you talk about paying	09:50:58
4	dues, what do you mean?	09:51:00
5	A. Just like what I just explained, just putting	09:51:01
6	in your time in a place. Respecting the people that	09:51:05
7	were there before you, you know, just little things.	09:51:08
8	Picking up trash, being cordial to the kids, just	09:51:11
9	being respectful.	09:51:14
10	Q. When you say putting in your time, what do	09:51:22
11	you mean by that?	09:51:29
12	A. Just like, you just, you know, you go to a	09:51:30
13	spot and you want to start surfing there, you know,	09:51:34
14	you just go out whenever you can, whenever there's a	09:51:38
15	break putting in your time in the water, in the	09:51:42
16	line-up, you know.	09:51:44
17	Q. And when you say respecting the older folks,	09:51:45
18	what do you mean by that?	09:51:54
19	A. Anyone that has been there before you.	09:51:55
20	Q. And how do you show respect to the people	09:51:58
21	that have been there before you?	09:52:02
22	A. By not paddling deeper than them, getting out	09:52:03
23	of their way when they're riding waves, you know.	09:52:08
24	Q. Does that same etiquette that you learned at	09:52:21
25	Indicator hold at Lunada Bay?	09:52:30

1           A. I think that etiquette holds for anywhere in 09:52:36  
2 the world. It's very similar anywhere down from 09:52:40  
3 Ensenada, down to Hawaii, Northern California, 09:52:45  
4 Redondo Beach, San Pedro, all those spots. It's the 09:52:48  
5 same etiquette, I believe. 09:52:52  
6           MR. CROWLEY: I want to breakout in a 09:52:58  
7 Beach Boys' song. 09:53:03  
8 BY MS. POOLEY: 09:53:03  
9           Q. At this point, how often do you surf at 09:53:03  
10 Lunada Bay? 09:53:07  
11           A. What do you mean how often, not, like what, a 09:53:08  
12 couple times a year or what are you -- it doesn't 09:53:13  
13 break all the time. 09:53:19  
14           So, then whenever it does break sometimes in 09:53:19  
15 a year, it maybe breaks ten times. Sometimes it 09:53:25  
16 breaks a little more. 09:53:29  
17           And if I'm not working, if I don't have any 09:53:30  
18 stuff to do, I'll try to go surfing. So, it all 09:53:33  
19 varies from the weather, you know. 09:53:36  
20           Q. Let's say in the last six months, how many 09:53:39  
21 times have you surfed at Lunada Bay? 09:53:42  
22           A. Probably the last six months, maybe, how many 09:53:45  
23 days? 09:53:50  
24           Q. Yes. 09:53:51  
25           A. Maybe like five to ten times, maybe a little 09:53:51

1	more.	09:53:58
2	Q. Have you ever barbecued on the beach at	09:54:04
3	Lunada Bay?	09:54:17
4	A. There's no beach, but on the rocks, yeah.	09:54:18
5	Q. And how often have you done that?	09:54:29
6	MR. CROWLEY: Over broad, but you can answer.	09:54:37
7	THE WITNESS: It just depends whoever, if	09:54:40
8	someone decides to bring food down, you do it. It's	09:54:43
9	not like a thing that we have every time that someone	09:54:47
10	brings food. There are days people don't eat. I	09:54:50
11	don't bring food.	09:54:54
12	BY MS. POOLEY:	09:54:54
13	Q. There's a barbecue pit?	09:54:54
14	A. There used to be.	09:54:58
15	Q. Do you know did somebody put that in?	09:55:05
16	A. The barbecue pit?	09:55:10
17	Q. Yeah.	09:55:11
18	MR. CROWLEY: Objection, vague and ambiguous,	09:55:12
19	lacks foundation. Go ahead.	09:55:13
20	THE WITNESS: It was already there when I	09:55:15
21	went. It was built before I started surfing there.	09:55:18
22	So, I don't know if it was there or not.	09:55:22
23	BY MS. POOLEY:	09:55:25
24	Q. And you say that it used to be there, is it	09:55:25
25	no longer there?	09:55:27



1 A. Well, the City had to tear it down. So, it's 09:55:28  
2 gone. 09:55:33

3 Q. Did the annual ceremonies for Danny Camplin 09:55:38  
4 and others who have passed, does that involve a 09:55:53  
5 barbecue? 09:55:56

6 A. Yes. It's a potluck. People bring food 09:55:57  
7 down. 09:56:02

8 Q. And they barbecue as well? 09:56:02

9 A. Yeah. 09:56:05

10 Q. Do you ever drink beer at Lunada Bay? 09:56:15

11 A. Yes. 09:56:20

12 Q. Okay. Have you seen others drink beer at 09:56:20  
13 Lunada Bay? 09:56:23

14 A. Yes. 09:56:24

15 Q. Do you know if it's legal to drink beer at 09:56:24  
16 Lunada Bay? 09:56:32

17 MR. CROWLEY: Objection, calls for a legal 09:56:34  
18 opinion. You can answer, if you know. 09:56:36

19 THE WITNESS: I don't know. 09:56:38

20 BY MS. POOLEY: 09:56:39

21 Q. You don't know? 09:56:39

22 A. Yeah. 09:56:40

23 Q. Have you ever seen any members of the 09:56:42  
24 Palos Verdes police at Lunada Bay? 09:56:56

25 A. Down on the rocks or like where, on the cliff 09:57:01

1	BY MS. POOLEY:	10:02:57
2	Q. And do you know where that garage door came	10:02:57
3	from?	10:03:00
4	A. I think it was -- it was Charlie Mowatt's	10:03:00
5	door. I think it was an old one, yeah.	10:03:11
6	Q. And who brought the garage door down to the	10:03:25
7	patio?	10:03:29
8	A. I don't know.	10:03:29
9	Q. And were you there?	10:03:30
10	A. Not when it was there.	10:03:31
11	Q. So, you didn't see it --	10:03:35
12	A. No.	10:03:37
13	Q. -- being put in?	10:03:37
14	A. No, no, but I helped.	10:03:39
15	MR. CROWLEY: That's okay. You've answered.	10:03:41
16	BY MS. POOLEY:	10:03:43
17	Q. What did you help do?	10:03:43
18	A. I did a little roofing on the garage door. I	10:03:45
19	put a cover on like a -- like a roofing material so	10:03:48
20	that it's waterproof.	10:03:55
21	Q. Did you see anyone else work on that roofing	10:04:02
22	or the patio at anytime?	10:04:06
23	A. I don't remember, but yeah.	10:04:08
24	Q. You don't remember if you saw anyone doing	10:04:12
25	any work?	10:04:14

1 MR. DIEFFENBACH: Can we stipulate that I'll 10:30:48  
2 join in every objection that counsel states here. 10:30:51  
3 MS. BACON: And I will as well. 10:30:55  
4 THE WITNESS: Repeat that again. 10:30:56  
5 BY MS. POOLEY: 10:30:57  
6 Q. If someone wanted to come to Lunada Bay who 10:30:58  
7 was not from the area -- 10:31:01  
8 A. Uh-huh. 10:31:02  
9 Q. -- and spend some time there, would that be 10:31:02  
10 all right? 10:31:05  
11 MR. CROWLEY: Same objection. 10:31:06  
12 THE WITNESS: Yeah, I don't -- to me 10:31:06  
13 personally -- 10:31:12  
14 BY MS. POOLEY: 10:31:13  
15 Q. Yeah. 10:31:13  
16 A. -- personally, I probably would not like to 10:31:14  
17 see other people, but I can't say for other people, 10:31:20  
18 you know. 10:31:26  
19 Q. When you say that you would not like to see 10:31:26  
20 other people, what do you mean by other people? 10:31:28  
21 A. Just other surfers maybe that, you know. 10:31:31  
22 Q. Other than what? 10:31:36  
23 A. Just other surfers, other than the people 10:31:39  
24 whoever surfs there, I guess. 10:31:42  
25 Q. So, the people who regularly surf there, is 10:31:48

1 that what you mean, is that the comparison of people 10:31:51

2 who regularly surf there? 10:31:53

3 A. I can't tell what they're saying, but I'm 10:31:53

4 just saying from my point of view, I probably 10:31:56

5 wouldn't be that happy about it. 10:31:59

6 Q. You wouldn't be happy about someone who was 10:32:01

7 new to Lunada Bay coming down to the Bay; is that 10:32:05

8 correct, is that what you're saying? 10:32:11

9 A. Yeah, a little bit, yeah. 10:32:12

10 Q. And why would you not be happy about that? 10:32:14

11 A. Because a lot of those people don't have 10:32:16

12 etiquette. They don't do, you know, they trash the 10:32:19

13 place and it just ruins everything, yeah. 10:32:23

14 Q. And what etiquette do they not have? 10:32:27

15 A. Lots of times it's not just Lunada Bay, but 10:32:30

16 etiquette, like all the other spots, it's a 10:32:33

17 competitive that is a high-performance wave, there's 10:32:36

18 etiquette of people backpedaling people going deeper 10:32:41

19 instead of waiting your turn. 10:32:45

20 And there's also etiquette of when you're 10:32:47

21 kind of, you know, a spot where it's competitive like 10:32:50

22 that, more of a high-performance wave, if you're new 10:32:54

23 in it, you kind of have to try to wait your turn, you 10:32:57

24 kind of just, you know. 10:33:00

25 And from what I experience people that come 10:33:05

1 A. No. 10:38:38

2 Q. Is there any expectation with respect to 10:38:38

3 where people park when they come to Lunada Bay? 10:38:42

4 MR. CROWLEY: Objection, lacks foundation, 10:38:47

5 it's vague. 10:38:49

6 THE WITNESS: No. 10:38:50

7 BY MS. POOLEY: 10:38:51

8 Q. Are there any rules or expectations with 10:38:52

9 respect to where people change into their wetsuits at 10:38:58

10 Lunada Bay? 10:39:01

11 MR. CROWLEY: Same objection. 10:39:02

12 THE WITNESS: Are you talking about outsiders 10:39:03

13 or just people that surf there? 10:39:05

14 BY MS. POOLEY: 10:39:07

15 Q. Anyone? 10:39:08

16 A. No. You can change anywhere you want, yeah. 10:39:09

17 Q. And that doesn't bother you? 10:39:12

18 A. What? 10:39:15

19 Q. If people change wherever they want? 10:39:15

20 A. It bothers me when a guy pulls up right next 10:39:18

21 to me, like don't give you your space kind of like 10:39:21

22 it's weird. 10:39:26

23 When you have a whole stretch of rocks and 10:39:26

24 they decide to come and park right next to you, maybe 10:39:30

25 they're trying to push people's buttons. They can do 10:39:33

1 whatever they want, yeah. 10:39:37

2 Q. Okay. Are there any rules or expectations 10:39:39

3 about how many people should surf at a time at 10:39:44

4 Lunada Bay? 10:39:48

5 MR. CROWLEY: Objection, vague, lacks 10:39:49

6 foundation, incomplete hypothetical. 10:39:51

7 THE WITNESS: No. 10:39:53

8 BY MS. POOLEY: 10:39:53

9 Q. No? 10:39:54

10 A. No. 10:39:54

11 Q. Is there any number that you think that is 10:39:55

12 ideal for the number that should be surfing at a time 10:39:58

13 at Lunada Bay? 10:40:02

14 MR. CROWLEY: Objection, incomplete 10:40:04

15 hypothetical, over broad, go ahead. 10:40:05

16 THE WITNESS: No. 10:40:07

17 BY MS. POOLEY: 10:40:07

18 Q. And you mentioned earlier about some older 10:40:08

19 people who have some priority to take a wave if they 10:40:19

20 want to because they have been there longer; is that 10:40:24

21 correct? 10:40:26

22 MR. CROWLEY: Objection, misstates his prior 10:40:26

23 testimony, but you can answer. 10:40:28

24 THE WITNESS: That they have the 10:40:30

25 right-of-way? 10:40:32

1 BY MS. POOLEY: 10:40:33

2 Q. Yes? 10:40:33

3 A. That's my point of view. That's my 10:40:34

4 etiquette, yeah, absolutely. I think people that 10:40:36

5 were there before me, I have to give them respect. 10:40:39

6 Q. And who are those people that have that right 10:40:43

7 in your perspective? 10:40:48

8 MR. CROWLEY: Objection, vague, lacks 10:40:50

9 foundation. 10:40:51

10 THE WITNESS: Just anyone that has been there 10:40:53

11 before me. 10:40:55

12 BY MS. POOLEY: 10:40:56

13 Q. And who is that? 10:40:57

14 A. Just like, you know, Frank Ferrara, Joe, you 10:40:58

15 know, Joe Bark. 10:41:04

16 Q. Who did you say after Frank? 10:41:07

17 A. Frank Ferrara. 10:41:09

18 Q. Okay. Thank you. 10:41:11

19 Anyone else besides Frank and Joe? 10:41:14

20 A. Yeah, just, there are other people. Anyone 10:41:19

21 that has been there longer than me. 10:41:25

22 Q. And who is that? I don't know who that is. 10:41:26

23 I'm asking for you to tell me. 10:41:29

24 MR. CROWLEY: Objection, lacks foundation. 10:41:31

25 THE WITNESS: Well, just it could be like 10:41:32

1	Charlie Mowatt.	10:41:39
2	BY MS. POOLEY:	10:41:46
3	Q. Just those three?	10:41:47
4	A. Yeah. My mind is going blank. It's like,	10:41:49
5	you know. So, it's just basically anyone. It's not	10:41:52
6	even the name. It's just people who have been there	10:41:57
7	before you.	10:41:59
8	Q. How do you know that they have been there	10:42:00
9	before you?	10:42:02
10	A. Because when I first went there, they were	10:42:02
11	already there.	10:42:07
12	Q. And do you know any others have that been	10:42:08
13	there before you that you would give deference to in	10:42:12
14	terms of taking a wave?	10:42:19
15	A. What now?	10:42:20
16	Q. That you would allow to take a wave when you	10:42:21
17	thought that it was your turn?	10:42:24
18	A. What now, are there people?	10:42:26
19	Q. Are there others besides that you've	10:42:29
20	identified?	10:42:34
21	A. That I can remember now.	10:42:35
22	Q. You don't remember anyone else?	10:42:35
23	A. Yeah, my mind is just.	10:42:37
24	Q. And did anyone ever explain to you any	10:42:40
25	particular etiquette for Lunada Bay?	10:42:54



1	MS. BACON: Vague and ambiguous.	10:42:59
2	THE WITNESS: No.	10:43:03
3	BY MS. POOLEY:	10:43:03
4	Q. Do you believe that people who are new to	10:43:04
5	Lunada Bay should come to the beach a few times	10:43:17
6	before they surf?	10:43:21
7	A. No. They can do whatever they want. I don't	10:43:22
8	feel that.	10:43:26
9	Q. Have you ever expressed that view to anyone?	10:43:26
10	A. No.	10:43:29
11	Q. You, I think, referred to Lunada Bay as being	10:43:30
12	a competitive high-performance wave; is that correct?	10:43:56
13	A. Well, the wave is, yeah, kind of, you know.	10:43:59
14	Q. What do you mean by that?	10:44:03
15	A. It's a high performance, like the wave is	10:44:04
16	fast and it's not for the beginners. It's a little	10:44:09
17	bit more for the experienced people. There are rocks	10:44:14
18	everywhere so. It's a better wave.	10:44:18
19	Q. A what wave?	10:44:21
20	A. It's a better wave a point break so the shape	10:44:23
21	is good.	10:44:27
22	Q. Do women surf at Lunada Bay?	10:44:47
23	A. Yes.	10:44:52
24	Q. Do you know any women who surf there?	10:44:53
25	A. Yes.	10:44:56

1	BY MS. POOLEY:	10:48:42
2	Q. Have you ever seen anybody in a wheelchair	10:48:42
3	down on the rocks at the Bay, Lunada Bay?	10:48:48
4	A. No.	10:48:52
5	Q. Have you ever seen anyone in a wheelchair up	10:48:52
6	on the bluff at Lunada Bay?	10:48:58
7	A. No.	10:49:00
8	Q. Have you ever said anything to someone that	10:49:01
9	you didn't recognize as being a local at Lunada Bay	10:49:21
10	to discourage them from being there?	10:49:26
11	A. What?	10:49:31
12	Q. Have you ever said anything to anyone who	10:49:32
13	wasn't someone who you considered to be a local?	10:49:34
14	A. A non-local.	10:49:38
15	Q. Okay. Let's use that term then.	10:49:39
16	Have you ever said anything to a non-local of	10:49:42
17	Lunada Bay to deter them from being at Lunada Bay?	10:49:47
18	A. I may have heckled, like booed.	10:49:51
19	Q. Heckled and booed?	10:49:59
20	A. Like booing, that's about it, yeah.	10:50:02
21	Q. Where were you when you were booing someone	10:50:09
22	at Lunada Bay for being a newcomer?	10:50:16
23	A. Maybe just on the rocks.	10:50:19
24	Q. So, not in the water --	10:50:23
25	A. No.	10:50:24

1 Q. -- correct? 10:50:26

2 A. Yeah. 10:50:26

3 Q. Okay. And so what was the person doing -- 10:50:27

4 let's backup. 10:50:31

5 How many times have you booed somebody who 10:50:32

6 was a newcomer? 10:50:36

7 A. I don't know. 10:50:37

8 Q. What's your best estimate? 10:50:40

9 A. More than 10 times. 10:50:45

10 Q. More than 20 times? 10:50:49

11 A. Maybe, I don't know. 10:50:52

12 Q. More than 30 times? 10:50:53

13 A. No, I don't think so. 10:50:56

14 Q. Is your best estimate between 10 and 30 10:50:59

15 times? 10:51:04

16 A. Yeah, I guess, but I don't think that it's 10:51:05

17 more than 30, yeah. 10:51:09

18 Q. Okay. And what was the person or persons 10:51:11

19 doing on those occasions when you were booing them? 10:51:19

20 A. Probably they were riding a wave. 10:51:23

21 Q. And you were on the shore and not in the 10:51:28

22 water? 10:51:32

23 MR. CROWLEY: Objection, compound. 10:51:32

24 THE WITNESS: I think I was just sitting on 10:51:33

25 the rocks. 10:51:35

1 BY MS. POOLEY: 10:51:36

2 Q. And why were you booing people? 10:51:37

3 A. Because I just felt like it. Can't you just 10:51:49

4 boo, boo, you know. 10:51:53

5 Q. Did you say anything to these non-locals who 10:51:57

6 were surfing other than booing at them -- 10:52:04

7 A. No. 10:52:08

8 Q. -- and other than booing? 10:52:14

9 A. One time like recently once the, a bunch of 10:52:24

10 kids came out, and one kid was being totally no 10:52:29

11 etiquette, a total A-hole, but the one guy that he 10:52:33

12 was with was nice, kind of a nice guy. 10:52:37

13 And I remember when they were going in, 10:52:40

14 paddling in and leaving and I talked to one guy and I 10:52:43

15 told him, hey, your friend has no etiquette. He's 10:52:45

16 just a jerk. 10:52:49

17 I kind of told him, hey, don't think that the 10:52:50

18 good waves are always at the peak. You sit inside 10:52:53

19 and you will be surprised how many good waves that 10:52:56

20 you get. 10:52:59

21 A lot of the people just think that the best 10:52:59

22 is there. They don't know the breaks. So, I 10:53:02

23 remember telling the kid, hey kid, don't think that 10:53:04

24 it's out there. 10:53:07

25 Don't listen to your buddy. If you sit 10:53:08

1 inside, you'll get good waves. I remember I said 10:53:10

2 that to him just recently. 10:53:13

3 Q. Okay. Have you ever said anything to any 10:53:15

4 non-local to deter them from being at Lunada Bay? 10:53:20

5 A. No. 10:53:26

6 Q. Have you ever brought any friends from 10:53:36

7 outside Lunada Bay to surf there? 10:53:42

8 A. No. 10:53:46

9 Q. Any reason why not? 10:53:47

10 A. Because it's, it's kind of like the etiquette 10:53:48

11 up in the area. So, just you come alone. 10:53:54

12 Q. Do you understand why that is the etiquette 10:54:03

13 to come alone? 10:54:06

14 MR. CROWLEY: Objection, lacks foundation. 10:54:08

15 THE WITNESS: I don't know. You just come 10:54:10

16 alone. I don't know why. You just come by yourself. 10:54:13

17 BY MS. POOLEY: 10:54:17

18 Q. You mentioned earlier that it's difficult to 10:54:18

19 get down the trail if you have having trouble 10:54:34

20 walking? 10:54:38

21 A. Uh-huh. 10:54:38

22 Q. Would it be safer if the trails were improved 10:54:39

23 down to the Bay? 10:54:42

24 MR. CROWLEY: Objection, lacks foundation, 10:54:45

25 incomplete hypothetical, it's vague. 10:54:47

1	THE WITNESS: What was that question again?	10:54:51
2	BY MS. POOLEY:	10:54:53
3	Q. Would it be safer if the trails were	10:54:53
4	improved?	10:54:56
5	MS. BACON: Calls for speculation.	10:54:57
6	THE WITNESS: Go ahead.	10:54:58
7	BY MS. POOLEY:	10:54:59
8	Q. Would it be safer do you think if the trails	10:55:00
9	were improved?	10:55:03
10	MR. CROWLEY: Same objection.	10:55:04
11	THE WITNESS: No, because those are not, the	10:55:05
12	hillside, that whole area it always erodes and stuff.	10:55:09
13	It's not an area where you can just put stairs or	10:55:14
14	something.	10:55:17
15	They have erosion, landslides after it rains,	10:55:18
16	sometimes after a long drought we have slides, so,	10:55:22
17	you know.	10:55:25
18	BY MS. POOLEY:	10:55:28
19	Q. Okay.	10:55:28
20	A. I think it would just, it would be very	10:55:28
21	difficult to build something. I don't know.	10:55:31
22	Q. All right. Have you ever observed any other	10:55:34
23	people saying or doing anything to deter non-locals	10:55:58
24	from using Lunada Bay?	10:56:04
25	A. No.	10:56:08

1 MR. CROWLEY: Objection, lacks foundation, 10:56:08  
2 calls for speculation. You may answer. 10:56:10

3 THE WITNESS: No. 10:56:13

4 MS. POOLEY: I think that he already did. 10:56:14

5 MR. CROWLEY: Just give me a second; okay. 10:56:19

6 MS. BACON: Could you read back the question, 10:56:36  
7 please. 10:56:37

8 10:56:37

9 (Whereupon, the record was read as  
10 follows:)

11 Q. All right. Have you ever  
12 observed any other people saying or  
13 doing anything to deter non-locals  
14 from using Lunada Bay?

15 A. No.

16 10:56:38

17 BY MS. POOLEY: 10:56:38

18 Q. Mr. Lee, you've been handed what has been 10:56:38  
19 marked as Exhibit 222 which is a three-page bates 10:57:36  
20 document, bates number Lee 00001 through 00003. 10:57:39

21 10:57:44

22 (Deposition Exhibit 222 was 10:57:44  
23 marked for identification 10:57:44  
24 and is attached hereto.) 10:57:44

25 10:57:44

1	BY MS. POOLEY:	10:57:44
2	Q. Have you ever seen Exhibit 222 before?	10:57:45
3	A. Have I seen this?	10:58:03
4	Q. Yes.	10:58:06
5	A. Yes.	10:58:07
6	Q. And Exhibit 222 contains E-Mails that you	10:58:08
7	sent on January 7th and 8th of 2011?	10:58:32
8	A. What now?	10:58:43
9	Q. Excuse me.	10:58:44
10	A. What now?	10:58:45
11	Q. Does Exhibit 222 contain E-Mails that you	10:58:45
12	sent on January 7th and 8th of 2011?	10:58:49
13	A. It just says, yeah, 7th and 8th, yeah.	10:58:54
14	Q. Yes?	10:59:06
15	A. Yes.	10:59:07
16	Q. And the E-Mail that's dated January 7, 2011,	10:59:07
17	it begins on the bottom of the second page, yeah, the	10:59:33
18	second page?	10:59:40
19	A. Uh-huh.	10:59:42
20	Q. Can you identify who you sent that E-Mail to?	10:59:43
21	A. That's Brad Ringer, I believe that one might	10:59:48
22	be Charlie Beukema.	10:59:55
23	Q. The Roxy Quinn is Brad?	11:00:00
24	A. Excuse me?	11:00:03
25	Q. You're saying the Roxy --	11:00:03



1	A. Roxy Quinn, yeah.	11:00:05
2	Q. That's who?	11:00:07
3	A. I think that's Charlie Beukema.	11:00:08
4	Q. And who's next?	11:00:16
5	A. Colm.	11:00:19
6	Q. Collin?	11:00:21
7	A. Colm, C-o-l-m.	11:00:22
8	Q. Oh, before that isn't there one?	11:00:26
9	A. Charlie Mowatt.	11:00:29
10	Q. Charlie Mowatt, and then Colm, and who is	11:00:32
11	that?	11:00:36
12	A. Just another guy that surfs there.	11:00:36
13	Q. What's his last name?	11:00:39
14	A. I believe it's Gallagher.	11:00:40
15	Q. Is his first name C-o-l-m?	11:00:43
16	A. Yes.	11:00:47
17	Q. Colm Gallagher, okay, who else?	11:00:47
18	A. I think that next one was David Camplin.	11:00:51
19	Q. Okay, and L.B. Control Agency?	11:00:58
20	A. Yeah, he just makes it.	11:01:03
21	Q. That's David?	11:01:05
22	A. Yeah.	11:01:06
23	Q. And who's next?	11:01:06
24	A. Dave Mello.	11:01:08
25	Q. Okay. Who's next?	11:01:13

1	A. David Millcreek.	11:01:15
2	Q. Okay. Who's next?	11:01:26
3	A. Derek Debraal.	11:01:28
4	Q. Who's next?	11:01:44
5	A. Eric Binz.	11:01:45
6	Q. All right. Who's next?	11:01:50
7	A. Geoff Dsena.	11:01:52
8	Q. Okay. Who's next?	11:02:01
9	A. Greg Jehelkas.	11:02:04
10	Q. Who's next?	11:02:15
11	A. Jay Duston.	11:02:18
12	Q. Who's next?	11:02:23
13	A. Joe Bark.	11:02:27
14	Q. Who's next?	11:02:31
15	A. John Camplin.	11:02:33
16	Q. Who's next?	11:02:39
17	A. Andy Patch.	11:02:41
18	Q. Okay. Who's next?	11:02:50
19	A. Art Rozzi.	11:02:52
20	Q. Who's next?	11:02:57
21	A. Mark Griep.	11:03:05
22	Q. Does Mark spell his name with a "K" or a "C"?	11:03:12
23	A. I don't know.	11:03:14
24	Q. Okay.	11:03:15
25	A. And Michael Papayans.	11:03:16

1	Q. Who's next?	11:03:27
2	A. I don't know who that one is, Woody.	11:03:29
3	Q. Woody Ris at Yahoo Dot Com, you don't know?	11:03:34
4	A. Yeah.	11:03:38
5	Q. Who's the next one?	11:03:43
6	A. The next one could be Peter Babros.	11:03:45
7	Q. Spell his last name.	11:03:49
8	A. B-a-b-r-o-s.	11:03:51
9	Q. Okay. Who's next?	11:03:56
10	A. I don't know that one, Redondo Beach. I	11:03:59
11	don't know that one.	11:04:03
12	Q. Who's next?	11:04:06
13	A. Reno Caldwell.	11:04:10
14	Q. Who's next?	11:04:19
15	A. Steve Fairbrother.	11:04:24
16	Q. Who's next?	11:04:32
17	A. Tom Sullivan.	11:04:33
18	Q. That's quite a list. Go ahead.	11:04:40
19	A. And one thing I think that you asked me about	11:04:43
20	the ashes, I think there has been one time that they	11:04:45
21	spread the ashes of Danny, I think.	11:04:49
22	Q. Were you present for that?	11:04:51
23	A. Yeah, but there were a lot of people there.	11:04:52
24	So, it was like, you know.	11:04:54
25	Q. So, you were present when Danny Camplin's	11:04:57

1 ashes were spread in the water at Lunada Bay; is that 11:05:03  
2 correct? 11:05:08

3 A. I was there for the ceremony, yeah. 11:05:08

4 Q. And when was that? 11:05:11

5 A. I think he died in '96. So, it was probably 11:05:13

6 in '96 I think or maybe the following year in '97, 11:05:18

7 but maybe in '96. 11:05:25

8 Q. And why did you send this E-Mail on 11:05:27

9 January 7, 2011, to this long list of individuals? 11:05:39

10 A. Well, it all started from an E-Mail that was 11:05:47

11 sent that I just kind of gave my opinion. It was not 11:05:54

12 towards outsiders. 11:05:58

13 It was towards the locals against localism of 11:06:00

14 the guys that already surf there, doesn't put 11:06:03

15 anything into it, so, we kind of, it was like a 11:06:08

16 New Year's resolution that I said. 11:06:12

17 I just said, they don't do anything. They 11:06:13

18 don't come and pickup trash. They don't do any of 11:06:16

19 the festivities. They don't really support the, 11:06:20

20 whatever we have, like whatever people clean up and 11:06:24

21 stuff like that. 11:06:27

22 So, I wrote to people saying, let's just kind 11:06:28

23 of take back our waves. It's just try to, you know, 11:06:35

24 so, that's when it all happened. 11:06:43

25 And then I thought that, and then Dave's 11:06:46

1 A. No. It was just a joke, yeah. 11:25:03

2 Q. Why is -- what is funny about that? 11:25:05

3 A. Well, a pirate, you see people, places, they 11:25:09

4 have pirate flags and stuff, you know. It's kind of 11:25:13

5 like, you know. There's no deep meaning. I just 11:25:17

6 wrote that. 11:25:27

7 Q. And then you wrote, because I was brought up 11:25:28

8 this way by you guys, paren, the older boys, paren, 11:25:29

9 not the fluffy powder puff ones, but the real solid 11:25:37

10 ones. 11:25:41

11 Who were you referring to as you guys that 11:25:42

12 brought you up this way? 11:25:48

13 A. Well, they didn't bring me up, but -- 11:25:49

14 MR. CROWLEY: Who were you referring to? 11:25:51

15 THE WITNESS: Just the older people. 11:25:53

16 BY MS. POOLEY: 11:25:56

17 Q. Who were the older people that you're 11:25:56

18 referring to? 11:25:59

19 A. It could be anyone, anyone older than me, 11:25:59

20 Frankie, Angelo, you know. 11:26:02

21 Q. Frankie who? 11:26:10

22 A. Ferrara. 11:26:12

23 Q. Angelo who? 11:26:13

24 A. Angelo Ferrara, but then it's -- 11:26:14

25 MR. CROWLEY: She just wants a list of names. 11:26:17

1 people that have been there. You go about, you don't 11:38:57  
2 drop in. You get out of people's way. You don't 11:39:00  
3 wear your wetsuit. 11:39:06  
4 BY MS. POOLEY: 11:39:07  
5 Q. I'm sorry, what? 11:39:07  
6 A. You don't wear your wetsuit, yeah, and just 11:39:08  
7 come alone, things like that. 11:39:15  
8 Q. And when you say respect older, the older 11:39:21  
9 people, what does it mean to respect the older 11:39:30  
10 people; how do you show that respect? 11:39:34  
11 MS. BACON: Vague and ambiguous as to the 11:39:38  
12 question, lacks foundation. 11:39:40  
13 MR. CROWLEY: Also, incomplete hypothetical. 11:39:43  
14 Now you can answer. 11:39:45  
15 MS. HEWITT: Join. 11:39:47  
16 THE WITNESS: Um, what do you mean by 11:39:47  
17 respect? 11:39:49  
18 BY MS. POOLEY: 11:39:49  
19 Q. How do you demonstrate respect for older 11:39:50  
20 people that you learn in terms of this etiquette? 11:39:54  
21 MS. BACON: Same objection. 11:39:57  
22 MR. CROWLEY: Same objection. 11:39:58  
23 THE WITNESS: Just by being cordial to them, 11:39:59  
24 saying hello, just being out of their way, being 11:40:01  
25 respectful, and being respectful. 11:40:11

1 surfers' way at Lunada Bay if they're on a wave or 11:43:07

2 take a wave; right? 11:43:11

3 A. You should, yes, but if an older guy that I 11:43:11

4 really respect, I really try to get out of the way. 11:43:15

5 And if it's maybe like a guy that's my age, we're 11:43:18

6 about the same, I might go to the shoulder and try 11:43:21

7 not to get in his way. 11:43:25

8 It's a preference on your part, whatever you 11:43:27

9 want to do, yeah. 11:43:31

10 Q. Okay. And you said the etiquette that you 11:43:33

11 learned is don't wear your wetsuit; what does that 11:43:39

12 mean? 11:43:42

13 A. Sometimes we like, I do, people that 11:43:42

14 generally surf in that type of area where you have to 11:43:46

15 walk down a cliff, I wear my clothes and I have a 11:43:49

16 backpack and bring a wetsuit and then I change. 11:43:56

17 I change on the ground, on the rocks. And 11:44:00

18 there are people that walk down in their wet suits 11:44:03

19 and just like etiquette and people that surf in that 11:44:06

20 area, we don't walk around in wetsuits. 11:44:11

21 It just gets too hot and so we don't, I don't 11:44:14

22 walk in my wetsuit. You don't walk around in the 11:44:17

23 wetsuits. 11:44:21

24 Q. And is there something that's a violation of 11:44:21

25 the way that you were brought up for someone to walk 11:44:26

1 down in their wetsuit? 11:44:29

2 A. No, no, it's not, no, no, you can do whatever 11:44:30

3 you want, but I mean, why would you want to walk down 11:44:33

4 10 to 20 minutes downhill in a wetsuit and you're all 11:44:37

5 sweaty. 11:44:40

6 So, people just don't wear wetsuits down the 11:44:41

7 trail. Every area is different. Some areas they 11:44:44

8 change and then walk around in wetsuits. 11:44:47

9 Every spot, you know, different areas, they 11:44:50

10 all have different little etiquettes, you know, so, 11:44:53

11 yeah. 11:44:58

12 Q. And you said that the etiquette that you 11:44:58

13 learned as well for Lunada Bay was to come alone? 11:45:05

14 A. Yeah. They don't bring, yeah, just coming by 11:45:09

15 yourself. 11:45:14

16 Q. So, nobody ever comes to Lunada Bay with two 11:45:16

17 or more people together? 11:45:20

18 A. I don't know. 11:45:21

19 MR. CROWLEY: Objection, incomplete 11:45:22

20 hypothetical, over broad. 11:45:24

21 THE WITNESS: I don't know that. 11:45:26

22 BY MS. POOLEY: 11:45:27

23 Q. Have you seen people go to Lunada Bay to surf 11:45:27

24 when they were not alone? 11:45:32

25 A. Do you mean locals or non-locals? 11:45:34



1 Q. Either. 11:45:36

2 A. Yeah, there are non-locals that come out in 11:45:37

3 groups, yeah. 11:45:41

4 Q. And that you considered to be a breach of the 11:45:42

5 etiquette? 11:45:44

6 A. No. They can do whatever they want, you 11:45:45

7 know, that etiquette thing is kind of what like in 11:45:48

8 P.V. like in that area, so, people that don't surf 11:45:57

9 there, they wouldn't know. 11:46:02

10 It's just like other spots, other spots 11:46:03

11 usually everyone goes together, but in, that's not 11:46:06

12 just in Lunada Bay, but in that area in P.V. people 11:46:10

13 usually goes alone. 11:46:13

14 But no one says anything, yeah. I've seen 11:46:16

15 people come out in groups and people come out by 11:46:18

16 themselves, but usually our people that surf there 11:46:20

17 they just come by themselves. 11:46:24

18 Q. The locals just come by themselves? 11:46:26

19 A. Yeah. I'm sure if they don't have a ride, 11:46:29

20 they get a ride from someone, but they usually come 11:46:32

21 alone. 11:46:35

22 Q. Okay. When you say that it's the etiquette, 11:46:35

23 do you mean, what do you mean by etiquette? 11:46:43

24 A. Etiquette is kind of like, it's not a rule, 11:46:46

25 but it's kind of an understanding when the first surf 11:46:50

1 culture arose. There's no written rule book. 11:46:54

2 I think they did that to try to keep older -- 11:47:01

3 I don't know, etiquette has been around way before I, 11:47:04

4 from the sixties and seventies, you know so. 11:47:08

5 Q. Then there's another line that says, you guys 11:47:13

6 made up the rules "N" terms of engagement; do you see 11:47:19

7 that? 11:47:23

8 A. Oh, yeah, yeah. 11:47:23

9 Q. Is the "N" short for "and"? 11:47:28

10 A. Yes. 11:47:32

11 Q. So, you guys made up the rules and terms of 11:47:33

12 engagement? 11:47:37

13 A. Yes. 11:47:38

14 Q. And what were you referring to as the rules 11:47:39

15 and terms of engagement? 11:47:42

16 A. Just etiquette, but yeah. 11:47:44

17 Q. Okay. And is that the etiquette that you 11:47:55

18 just explained about respecting the older people, not 11:48:06

19 dropping in, getting out of the way, not wearing your 11:48:09

20 wetsuit, and coming alone? 11:48:12

21 MS. BACON: Lacks foundation, vague and 11:48:14

22 ambiguous, calls for speculation. 11:48:16

23 MR. CROWLEY: Argumentative, go ahead. 11:48:23

24 THE WITNESS: I lost my train of thought. 11:48:25

25 Can you repeat that? 11:48:27

1 BY MS. POOLEY: 11:48:28

2 Q. When you refer to in your E-Mail of the rules 11:48:28

3 and terms of engagement, and you said that's just the 11:48:31

4 etiquette, is that the etiquette that you just 11:48:34

5 explained to me or some other etiquette? 11:48:37

6 A. No, just general etiquette, how you behave, 11:48:40

7 you know. 11:48:44

8 Q. Well, why don't you tell me specifically what 11:48:45

9 the etiquette was that you were referring to when you 11:48:49

10 said the rules and terms of engagement? 11:48:52

11 A. Coming alone, but one thing I have to say, 11:48:55

12 they never told me. This is from what I see. These 11:49:00

13 guys are a lot older generation. 11:49:04

14 There are guys that are younger than them and 11:49:06

15 older than me. They never told me like this is the 11:49:09

16 rule. I don't want you to -- I just want to set that 11:49:13

17 straight. 11:49:17

18 So, the etiquette and stuff that I've noticed 11:49:17

19 is from my visual thing that I've seen how people 11:49:21

20 behave. 11:49:23

21 How people -- like coming alone. I grew up 11:49:24

22 in Palos Verdes and lived there for a long time. 11:49:31

23 None of my friends that surfed there took me there. 11:49:34

24 I had to do it myself; do you understand kind of. 11:49:38

25 Q. Uh-huh. 11:49:41

1 A. It's kind of like that, so, yeah. 11:49:42

2 Q. Okay. So, other than coming alone, what are 11:49:45

3 the rules and terms of engagement that you were 11:49:50

4 referring to that you called the etiquette? 11:49:52

5 A. Just being respectful. 11:49:55

6 Q. Anything else? 11:50:02

7 A. Know your place in the line-up. Don't 11:50:04

8 backpedal people. 11:50:08

9 Q. Is there anything else that you were 11:50:13

10 referring to as the rules and terms of engagement? 11:50:15

11 A. That's probably about it. That's it, you 11:50:18

12 know. What did I write in there. 11:50:24

13 Q. When you say, know your place in the line-up, 11:50:25

14 what do you mean by that? 11:50:29

15 A. I just started surfing there, like if I go 11:50:30

16 there the first time, usually, it's not just Lunada 11:50:34

17 Bay, but all the other areas that are kind of 11:50:38

18 high-performance waves, you don't just go right out 11:50:40

19 to the peak. You've got to sit. 11:50:43

20 People can go anywhere they want, but in a 11:50:46

21 place like that, even like in Hawaii, you sit inside. 11:50:50

22 And it took me years to gradually little bit get 11:50:54

23 further up, further up, further up, you know, so. 11:50:57

24 Q. And when you say don't backpedal people, what 11:51:07

25 are you referring to? 11:51:13

1 BY MS. POOLEY: 11:52:30

2 Q. Have you ever seen that happen? 11:52:31

3 A. Yeah. They paddle around, but it's hard to 11:52:32

4 get a wave because no one is going to give him a 11:52:36

5 wave. It's not an easy wave to ride and people that 11:52:39

6 surf there for a long time know how the wave breaks. 11:52:44

7 They've been sitting there and a guy comes 11:52:47

8 out and goes deeper, they're just going to go. It's 11:52:49

9 totally disrespectful whether you go to San Onofre, 11:52:52

10 Hawaii, yeah. 11:52:56

11 You go to places, you're going to get punched 11:52:58

12 if you do that in Hawaii, you know. 11:53:02

13 Here the worst of it probably, I don't know, 11:53:05

14 probably you would just dropped in on, a guy will 11:53:07

15 just go, you know. 11:53:11

16 Q. Okay. Then there's a line that says, I don't 11:53:13

17 understand why all of a sudden you're changing 11:53:21

18 everything for the worse; what were you referring to 11:53:23

19 there? 11:53:28

20 A. I think, I'm not positive, but I think it was 11:53:29

21 from that, the Davis letter basically saying that the 11:53:39

22 ocean is open to everyone, the religious one, that 11:53:46

23 John's brother wrote. 11:53:53

24 So, maybe I just didn't like it that I 11:53:54

25 thought that he wrote that because he was just, 11:53:57

1 everything would get destroyed if you just had 11:53:59  
2 everyone with no etiquette and no nothing and you 11:54:02  
3 just come out and ruin everything. 11:54:05

4 And I just didn't feel in my opinion that, I 11:54:08  
5 didn't want the change. It would have been a bummer. 11:54:11  
6 If it happens, it happens, but I couldn't understand 11:54:15  
7 why. I thought that John wrote that, so, yeah. 11:54:17

8 Q. So, you were objecting to what you thought 11:54:20  
9 John, John Camplin had written, but his brother David 11:54:24  
10 had written about -- 11:54:27

11 A. Yes, yes. 11:54:28

12 MR. CROWLEY: Let her finish. 11:54:29

13 BY MS. POOLEY: 11:54:30

14 Q. -- about the ocean being open to everyone? 11:54:31

15 A. Yes. 11:54:33

16 Q. Okay. And then you wrote, so, you don't mind 11:54:34  
17 if Troy, parentheses, Buffalo head, close 11:54:37  
18 parentheses, backpedals Jesse or Kailee; do you see 11:54:42  
19 that? 11:54:46

20 A. Yes. 11:54:46

21 Q. And who is Troy? 11:54:47

22 A. I think that I mentioned to you, he was the 11:54:50  
23 taker. Remember, we talked about the taker. 11:54:54

24 MR. CROWLEY: I think that she's just asking 11:55:07  
25 for his name. What is Troy's name. 11:55:09

1 THE WITNESS: I don't know his last name, but 11:55:12  
2 I told her that already. 11:55:15  
3 BY MS. POOLEY: 11:55:16  
4 Q. And Troy is a non-local? 11:55:17  
5 A. Yeah, but he surfs there. He's there. He's 11:55:19  
6 a local, no, what do you mean by non-local. He 11:55:24  
7 didn't grow up there, but he surfs there. 11:55:28  
8 Q. You used the term earlier non-local; what do 11:55:31  
9 you mean? 11:55:35  
10 A. Non-local, they didn't go to high school 11:55:35  
11 there. They didn't grow up there. They didn't go to 11:55:38  
12 school there kind of. 11:55:41  
13 Q. And by there, you mean Palos Verdes? 11:55:42  
14 A. Yeah, it could mean general terms. 11:55:48  
15 Q. I'm just asking what you mean by that. 11:55:52  
16 A. Yeah, meaning, that he didn't grow up there. 11:55:54  
17 He didn't go to school there. 11:55:56  
18 Q. And who is Jesse? 11:55:59  
19 A. Jesse is John's daughter. 11:56:02  
20 Q. John Camplin's daughter? 11:56:05  
21 A. Yes -- no, I'm sorry. I'm sorry. Jesse is 11:56:08  
22 his son. 11:56:11  
23 Q. Okay. And who is Kailee? 11:56:13  
24 A. That's his daughter, John's daughter. 11:56:16  
25 Q. John Camplin's daughter? 11:56:21

1 etiquette in that situation? 12:09:51

2 A. You just have to take it, deal with it, and 12:09:52

3 just don't mouth out. That's what I would do. Just 12:09:55

4 be respectful. Don't go back, and act like nothing 12:09:58

5 happened. Just sit there again and you wait. 12:10:02

6 That's how I did it, you know. I never said 12:10:05

7 a word when someone dropped in on me after I waited 12:10:09

8 for hours for a wave. 12:10:14

9 I said nothing and I went back and sat back 12:10:16

10 and a smiling happy face. That's all it's part of, 12:10:17

11 you know, putting your time into a place. 12:10:21

12 Q. So, an outsider to Lunada Bay should expect 12:10:26

13 to put in some time before they can surf without 12:10:33

14 getting dropped in on? 12:10:36

15 MS. HEWITT: Misstates testimony. 12:10:40

16 MR. CROWLEY: Vague and ambiguous. 12:10:41

17 THE WITNESS: I don't know. What, it's like 12:10:43

18 that anywhere. It's not just Lunada Bay. It's like 12:10:46

19 that anywhere that has a point break, a reef break, 12:10:50

20 they should expect that. 12:10:53

21 And I guarantee you a hundred percent they go 12:10:55

22 out there someone being surfing there, not Lunada 12:10:58

23 Bay, other areas, they will get dropped in on. 12:11:02

24 Out in Hawaii, maybe the locals just didn't 12:11:05

25 have time, you have to show time, go anyway maybe the 12:11:07



1 guy doesn't know that he's an outsider. It's part of 12:11:11

2 it. It's the culture. 12:11:14

3 BY MS. POOLEY: 12:11:16

4 Q. Can an outsider at Lunada Bay ever put in 12:11:17

5 enough time so that they don't get dropped in on when 12:11:21

6 they try to surf there? 12:11:24

7 MR. CROWLEY: Objection, vague and ambiguous. 12:11:26

8 THE WITNESS: I'm sure they can. 12:11:29

9 BY MS. POOLEY: 12:11:30

10 Q. How much time? 12:11:30

11 A. It takes a long time. 12:11:31

12 MR. CROWLEY: Same objection. 12:11:32

13 THE WITNESS: It took me a long time and I'm 12:11:33

14 from there. It's not overnight. It took me years, 12:11:35

15 five to ten years. 12:11:40

16 BY MS. POOLEY: 12:11:41

17 Q. So, it would take that long for an outsider? 12:11:42

18 MR. CROWLEY: Same objection. 12:11:44

19 THE WITNESS: No, no. 12:11:46

20 BY MS. POOLEY: 12:11:46

21 Q. Is that what you expect? 12:11:46

22 A. No. It all varies, but that's how much I 12:11:48

23 felt it took me for me to get comfortable at a place. 12:11:53

24 You've just got to put in your time. 12:11:57

25 Q. And by putting in your time, you mean being 12:12:01

1 There are people that surf there that didn't grow up 12:18:27  
2 there. 12:18:31

3 Q. And are they an outsider or non-local? 12:18:31

4 A. They didn't grow up there, non-local. 12:18:36

5 Q. Does non-local mean outsider? 12:18:39

6 A. Maybe in that part there I meant it, yeah. 12:18:42

7 Q. Okay. And then you wrote, there are other 12:18:45  
8 options to deter outsiders from surfing our home. 12:18:49

9 What did you mean by deter outsiders from 12:18:54  
10 surfing our home? 12:18:56

11 A. Well, just make it, discourage them maybe 12:18:57  
12 just. 12:19:03

13 Q. And why were you talking about discouraging 12:19:03  
14 outsiders from surfing at Lunada Bay? 12:19:09

15 A. Because these guys already surf there, 12:19:12  
16 they're takers. To me they're just takers, you know. 12:19:16  
17 They don't do anything. They don't clean trash. 12:19:19  
18 They just come, eat food, do whatever. And then they 12:19:23  
19 leave. I just think they could do more. 12:19:28

20 Q. And you reference riding together as a way to 12:19:31  
21 deter these outsiders; what do you mean by riding 12:19:34  
22 together? 12:19:37

23 A. It's like you ride in front of them. You 12:19:37  
24 ride in front of them. 12:19:44

25 Q. On the same wave? 12:19:45

1 There are people that surf there that didn't grow up 12:18:27  
2 there. 12:18:31

3 Q. And are they an outsider or non-local? 12:18:31

4 A. They didn't grow up there, non-local. 12:18:36

5 Q. Does non-local mean outsider? 12:18:39

6 A. Maybe in that part there I meant it, yeah. 12:18:42

7 Q. Okay. And then you wrote, there are other 12:18:45  
8 options to deter outsiders from surfing our home. 12:18:49

9 What did you mean by deter outsiders from 12:18:54  
10 surfing our home? 12:18:56

11 A. Well, just make it, discourage them maybe 12:18:57  
12 just. 12:19:03

13 Q. And why were you talking about discouraging 12:19:03  
14 outsiders from surfing at Lunada Bay? 12:19:09

15 A. Because these guys already surf there, 12:19:12  
16 they're takers. To me they're just takers, you know. 12:19:16  
17 They don't do anything. They don't clean trash. 12:19:19  
18 They just come, eat food, do whatever. And then they 12:19:23  
19 leave. I just think they could do more. 12:19:28

20 Q. And you reference riding together as a way to 12:19:31  
21 deter these outsiders; what do you mean by riding 12:19:34  
22 together? 12:19:37

23 A. It's like you ride in front of them. You 12:19:37  
24 ride in front of them. 12:19:44

25 Q. On the same wave? 12:19:45

1 A. No. 13:13:18

2 Q. Did you go to court over threats? 13:13:19

3 A. It wasn't a court. He put a restraining 13:13:23

4 order. So, I had to go to a restraining order in 13:13:26

5 front of the judge, yeah. 13:13:31

6 Q. In a courthouse? 13:13:33

7 A. So, like earlier if I've been to court, I 13:13:35

8 wasn't sure. I've never been arrested for anything. 13:13:37

9 Q. But you had a restraining order put on you? 13:13:42

10 A. Uh-huh. 13:13:45

11 Q. Who is Todd Clark? 13:13:45

12 A. He was an ex-boyfriend of the girl that I was 13:13:47

13 dating at the time and he was stalking her. 13:13:51

14 Q. Okay. Did Todd Clark ever surf at Lunada Bay 13:14:03

15 to your knowledge? 13:14:16

16 A. No. He's not a surfer. 13:14:16

17 Q. Then you say, there are other options than 13:14:18

18 threats and violence to make their time in our home a 13:14:25

19 bummer; do you see that? It's all in caps. 13:14:28

20 A. Uh-huh. 13:14:42

21 Q. What other options were you referring to 13:14:43

22 there? 13:14:46

23 A. Towards, just like, you know, maybe just, 13:14:47

24 just like dropping in on them. Just ride together, 13:14:53

25 you know. 13:14:57

1 Q. Anything other than dropping in on these 13:15:02  
2 outsiders as a way to make their time in your home a 13:15:05  
3 bummer? 13:15:10  
4 A. What now? 13:15:11  
5 Q. Were you referring to any other options to 13:15:12  
6 make these outsiders' time in your home a bummer? 13:15:18  
7 A. Was there any other options? 13:15:21  
8 Q. Yeah. I'm referring to your E-Mail where you 13:15:23  
9 say, there are other options? 13:15:26  
10 A. No, no, no. 13:15:27  
11 Q. The only option to make their time a bummer 13:15:30  
12 is to drop in on them? 13:15:35  
13 A. Or maybe heckle them, maybe. 13:15:37  
14 Q. And have you ever dropped in on outsiders so 13:15:40  
15 that they would have their time be a bummer? 13:15:48  
16 A. No. 13:15:53  
17 MR. CROWLEY: Objection, it's vague 13:15:55  
18 argumentative. Go ahead. 13:15:56  
19 BY MS. POOLEY: 13:15:59  
20 Q. You've never done that? 13:15:59  
21 A. No. 13:16:00  
22 Q. Have you ever seen anyone else do that to an 13:16:01  
23 outsider? 13:16:03  
24 MR. CROWLEY: Same objections. 13:16:04  
25 THE WITNESS: I've never seen it. 13:16:05

1 Lunada Bay so that they would have a bummer of a time 13:17:08

2 there? 13:17:11

3 MR. CROWLEY: It's vague, but go ahead. 13:17:11

4 THE WITNESS: Probably, yeah, I've heckled 13:17:13

5 people. 13:17:15

6 BY MS. POOLEY: 13:17:17

7 Q. And have you ever seen anyone else heckle any 13:17:20

8 outsiders at Lunada Bay? 13:17:25

9 MR. CROWLEY: Objection, vague. 13:17:27

10 THE WITNESS: No. I don't know exactly who, 13:17:28

11 because, no. 13:17:31

12 BY MS. POOLEY: 13:17:32

13 Q. Is that "yes", you have and you don't know 13:17:33

14 who? 13:17:35

15 A. I hear maybe boo, but I don't know who yelled 13:17:35

16 it if I'm in the water. I don't know. 13:17:39

17 Q. So, the only heckling of outsiders that 13:17:42

18 you've ever heard from anyone other than yourself is 13:17:44

19 like boo? 13:17:50

20 A. It's like boo or -- 13:17:55

21 Q. What is that? 13:17:57

22 A. It's just like a boo. It's just like. 13:17:57

23 Q. It's another sound? 13:18:00

24 A. Yeah. There's no meaning or anything. 13:18:02

25 Q. Okay. And then you say, we just need to 13:18:07

1 you backpedal people. Don't do that. We can all get 13:21:12

2 waves. There are plenty of them. 13:21:17

3 MS. POOLEY: Mr. Lee, you've been handed a 13:21:22

4 one-page document that has been marked as Exhibit 224 13:21:54

5 to your deposition and is bates stamped Lee 00000591. 13:21:57

6 13:21:57

7 (Deposition Exhibit 224 was 13:21:57

8 marked for identification 13:21:57

9 and is attached hereto.) 13:22:01

10 13:22:01

11 BY MS. POOLEY: 13:22:01

12 Q. Have you seen Exhibit 224 before? 13:22:01

13 A. Yes. 13:22:08

14 Q. And Exhibit 224 contains an E-Mail that you 13:22:09

15 sent on January 2nd, 2011, on the lower portion; 13:22:17

16 correct? 13:22:22

17 A. Yes. 13:22:22

18 Q. And who did you send that E-Mail to? 13:22:23

19 A. The one on the bottom? 13:22:36

20 Q. Yes. 13:22:38

21 A. That's the New Year's resolution. This is 13:22:39

22 the one I believe that you guys -- I believe this is 13:22:45

23 the one that started the chain of E-Mails. This is 13:22:52

24 the first one. 13:23:04

25 Q. And so who did you send it to? 13:23:05

1 A. I don't know exactly, but it was a group, I 13:23:07  
2 believe. 13:23:10  
3 Q. The same group that's listed on the second 13:23:10  
4 page of Exhibit 222? 13:23:13  
5 A. I couldn't tell you, but it was a group, 13:23:15  
6 yeah. 13:23:17  
7 Q. There's a reference to, at least not in a 13:23:17  
8 peak; what is the peak? 13:23:27  
9 A. That's the furthest out. 13:23:28  
10 Q. The furthest out from where? 13:23:33  
11 A. Further, like if here's this land, and the 13:23:37  
12 waves break this way. The guy sitting the furthest 13:23:45  
13 out on the peak. 13:23:49  
14 Q. At Lunada Bay? 13:23:49  
15 A. Yeah. 13:23:52  
16 Q. Okay. 13:23:52  
17 A. Peak means where the wave starts to break. 13:23:54  
18 Q. And then you say, to tell you the truth, I 13:24:00  
19 would rather see an empty unriden wave at the point 13:24:10  
20 then to see certain people riding them. 13:24:14  
21 And where is the point? 13:24:17  
22 A. That's the right, where we surf. 13:24:18  
23 Q. At Lunada Bay? 13:24:23  
24 A. Yeah. 13:24:25  
25 Q. And who are the certain people you would not 13:24:26



1 like to see riding a wave and prefer an unriden 13:24:29  
2 wave? 13:24:33  
3 A. I wouldn't really care, but if I was there, 13:24:33  
4 just the takers, you know. 13:24:36  
5 Q. And who are the takers that you were 13:24:41  
6 referring to here? 13:24:43  
7 A. Like Troy, you know. 13:24:44  
8 Q. Anyone else? 13:24:47  
9 A. There was Chris, but he really doesn't surf 13:24:49  
10 there. 13:24:54  
11 Q. So, were you only referring to Chris? 13:24:54  
12 A. Chris, me and him have personal kind of 13:24:57  
13 issues, not in the water. So, I just feel like he's 13:25:00  
14 not a real good person, you know. 13:25:03  
15 Other people might differ. So, me and him 13:25:04  
16 have a difference. It has nothing to do with 13:25:09  
17 surfing. 13:25:12  
18 Q. When you say certain people, on this E-Mail 13:25:12  
19 of Exhibit 224, were you referring to anyone other 13:25:15  
20 than Troy? 13:25:18  
21 A. No, no. 13:25:20  
22 Q. Because it reads as more than one person when 13:25:24  
23 you say people. So, that's why I'm asking. 13:25:27  
24 A. No. You've got to understand, I wrote this 13:25:30  
25 like kind of like you get all, obviously, you can 13:25:33

1 listen to me, I'm not the best grammar, not talking 13:25:37  
2 stuff. 13:25:42  
3 So, I'm just punching stuff in. It might not 13:25:42  
4 be perfect grammar. I might use words that mean 13:25:45  
5 differently, but so. 13:25:50  
6 Q. So, Buffalo head is Troy? 13:25:51  
7 A. Yes. 13:25:55  
8 Q. And then there's a reference to a faggot knee 13:25:55  
9 boarder who rides a Stavros surfboard; is that Troy? 13:26:00  
10 A. No, that's Chris. 13:26:06  
11 Q. Chris -- 13:26:06  
12 A. Peterson. 13:26:07  
13 Q. So, you were referring to Chris Peterson as 13:26:08  
14 well? 13:26:11  
15 A. Yeah. 13:26:11  
16 Q. Is Chris Peterson gay? 13:26:14  
17 A. No. And I have to say that I was ignorant. 13:26:16  
18 I should not say that calling him a faggot. I'm not. 13:26:20  
19 I should not have said that. He's not gay. 13:26:23  
20 Q. And then you say, and does Chris Peterson 13:26:28  
21 ride a knee boarder? 13:26:33  
22 A. Yes. 13:26:37  
23 Q. And it's a Stavros knee boarder? 13:26:38  
24 A. That's the person who made it. 13:26:42  
25 Q. Okay. And you say, nothing against Mike; who 13:26:44

1 are you referring to; who is Mike? 13:26:48

2 A. That's Mike Stavros, that's the guy. 13:26:50

3 Q. You weren't calling Mike Stavros a taker, 13:26:53

4 he's just the one who made the knee board; is that 13:26:57

5 correct? 13:27:01

6 A. No. Mike doesn't live in P.V. He lives in 13:27:01

7 San Pedro. That's a totally different group. 13:27:04

8 Q. You weren't referring to Mike as someone you 13:27:07

9 didn't want to see riding the wave; is that correct? 13:27:12

10 A. Mike Stavros? 13:27:14

11 Q. Yes. 13:27:16

12 A. No. I get along with Mike. 13:27:18

13 Q. And then there's a reference to, one who 13:27:20

14 makes millions and drives around in his \$100,000 car, 13:27:22

15 but never gives -- 13:27:26

16 A. Uh-huh. 13:27:28

17 Q. -- who is that? 13:27:29

18 A. Yeah, Mark Aricco. 13:27:30

19 Q. Mark who? 13:27:33

20 A. Mark Aricco. 13:27:34

21 Q. Spell his last name. 13:27:36

22 A. A-r-i-c-c-o. 13:27:38

23 Q. Okay. And then were you referring to him as 13:27:40

24 some of the certain people that you would rather not 13:27:43

25 see riding the wave? 13:27:47

1           A. No, me and Mark we have our ups and downs. 13:27:49  
2           I've known him since we were in high school. He 13:27:54  
3           makes a lot of money. I wish that he would do more 13:27:57  
4           to help out the community. Show up for trash pickup. 13:28:01  
5           Q. In your view is Mark Aricco a taker? 13:28:04  
6           A. It's hard to say because he's a nice guy. I 13:28:07  
7           get along with Mark, if I saw him right now even 13:28:11  
8           though I wrote this. I'm totally cordial with Mark, 13:28:14  
9           you know. 13:28:17  
10          Q. That's not really my question. 13:28:18  
11                Do you consider Mark Aricco to be a taker? 13:28:20  
12          A. Sometimes when he acts like it, but lately he 13:28:23  
13          has been, he's trying to change, I think. 13:28:28  
14          Q. So, in January of 2011 did you think of 13:28:34  
15          Mike Aricco as a taker? 13:28:37  
16          A. Yes. 13:28:40  
17          Q. And he grew up where? 13:28:40  
18          A. He grew up in Palos Verdes, also. It's Mark 13:28:42  
19          Aricco. 13:28:47  
20          Q. Thank you. So, next you wrote, next time 13:28:48  
21          you're out in the water and you see one of these 13:29:08  
22          takers taking another wave from your promised land, 13:29:11  
23          our church, slash, home, slash, sanctuary, slash, 13:29:15  
24          temple, paren, don't think twice and let's take back 13:29:19  
25          what they're taking from us; do you see that? 13:29:22

1 A. Yes. 13:29:25

2 Q. And what did you mean by taking back what 13:29:26

3 they're taking from us? 13:29:29

4 A. Well, I just, nothing specific. I just feel 13:29:30

5 that they could do more, you know. They just take 13:29:35

6 waves. They grew up there. They should appreciate 13:29:38

7 it. So, that's what I basically. 13:29:42

8 Q. When you say that, that you and the people 13:29:45

9 that you're sending this E-Mail to, let's take back 13:29:49

10 what they're taking from us, how would you take back? 13:29:53

11 A. Oh, I just mean maybe ride together. We'll 13:29:56

12 just burn them. 13:30:01

13 Q. So, drop in on them and burn them on their 13:30:03

14 wave? 13:30:07

15 A. Yeah, that was my suggestion, but understand 13:30:07

16 that the people don't because I said that, they don't 13:30:11

17 do what -- everybody is an individual. 13:30:16

18 Q. So then you wrote, do not feel guilty when 13:30:19

19 taking back what was ours in the first place. 13:30:23

20 What were you referring to as yours in the 13:30:25

21 first place? 13:30:28

22 A. Well, I just feel like, I keep it clean. I 13:30:29

23 feel that it's my home. I feel close to it, you 13:30:35

24 know. I put in a lot of time and I put in a lot of 13:30:39

25 effort to keep it clean. 13:30:42

1 Keep it, you know, semi, keep it all 13:30:44  
2 respectful and stuff. I have a deep feeling for the 13:30:50  
3 place. So, that's what I meant. 13:30:53  
4 Q. And you are referring to Lunada Bay in 13:30:55  
5 particular -- 13:30:59  
6 A. Yes. 13:30:59  
7 Q. -- as your home -- 13:30:59  
8 A. Yes. 13:31:00  
9 Q. -- and your church and your sanctuary and 13:31:00  
10 your temple? 13:31:03  
11 A. Sure, yes, yes. 13:31:04  
12 Q. And in terms of your effort to keep it clean, 13:31:05  
13 that's the annual trash clean up days and other times 13:31:13  
14 that you pickup trash? 13:31:16  
15 A. Absolutely. Any time I see trash on the 13:31:18  
16 trail, I'll pick it up and I'll bring it up, you 13:31:21  
17 know. 13:31:48  
18 MS. POOLEY: Is there another person who 13:31:48  
19 would like to speak their presence on the record. 13:31:51  
20 MR. OTTEN: My name is Victor Otten, 13:31:52  
21 V-i-c-t-o-r, O-t-t-e-n. I'm on the caption with her 13:32:08  
22 law firm. 13:32:09  
23 MS. POOLEY: You've been handed what has been 13:33:10  
24 marked as Exhibit 225. It's a one-page document and 13:33:13  
25 is bates labeled Lee 00000595. 13:33:15

1	BY MS. POOLEY:	14:06:03
2	Q. You tell me when you hear your voice.	14:06:04
3	A. Okay. Can you turn it a little this way.	14:06:06
4	MS. POOLEY: Sure.	14:06:12
5		14:06:24
6	(Discussion held off the record.)	14:06:24
7		14:06:40
8	THE WITNESS: That's me.	14:06:41
9	BY MS. POOLEY:	14:06:51
10	Q. So, up until then?	14:06:51
11	A. Yeah.	14:06:53
12	Q. Okay. So, you said, the reason there's a lot	14:06:54
13	of space is because we keep it like that. We fucking	14:06:59
14	hassle people; is that you?	14:07:02
15	A. Yes, I said that.	14:07:03
16	Q. You said, we'll burn you every single wave?	14:07:04
17	A. Yes.	14:07:08
18	Q. And you said, there are still fights down	14:07:09
19	here. People will just fucking duke you out, work	14:07:11
20	your car and get in fights?	14:07:14
21	A. Yes.	14:07:15
22	Q. Okay. After the first line, a lot of younger	14:07:16
23	kids that will come down here, that sounds to me like	14:07:29
24	another voice.	14:07:33
25	I want you to listen to, you shouldn't	14:07:33

1	fucking come down here. Stay away from this area.	14:07:34
2	Stay right here.	14:07:34
3	Tell me if you recognize the voice who says	14:07:39
4	that; okay.	14:07:41
5		14:07:41
6	(Discussion held off the record.)	14:07:41
7		14:07:57
8	BY MS. POOLEY:	14:07:57
9	Q. Is that you?	14:07:58
10	A. It's hard to say. That could be me.	14:07:59
11	Q. You shouldn't fucking come down here. Stay	14:08:03
12	away from this area. Stay right here. That might be	14:08:06
13	you?	14:08:10
14	A. Yeah.	14:08:10
15	Q. Do you want to hear it again?	14:08:10
16	A. Okay.	14:08:13
17		14:08:13
18	(Discussion held off the record.)	14:08:13
19		14:08:36
20	BY MS. POOLEY:	14:08:36
21	Q. Is that you?	14:08:36
22	A. That kind of sounds like me.	14:08:37
23		14:08:37
24	(Discussion held off the record.)	14:08:37
25		14:09:00



1 don't want to go through that shit again? 14:12:25

2 A. Yeah. 14:12:28

3 Q. I never bring friends. The friends that I 14:12:28

4 have here all surf here? 14:12:31

5 A. Uh-huh. 14:12:33

6 Q. Yes? 14:12:33

7 A. Yes. 14:12:34

8 Q. Did you say, you can't have friends outside 14:12:34

9 here because they're going to want to come out here 14:12:36

10 and surf and you have to got to pick and choose like 14:12:39

11 FaceBook? 14:12:41

12 A. Yes. 14:12:41

13 Q. Did you say, it's not just here. It goes all 14:12:41

14 the way up the coast of California. All the way up 14:12:45

15 to Oregon there are spots that you can't get out? 14:12:47

16 A. Yes. 14:12:50

17 Q. And do you know who said, good morning now 14:12:50

18 that you guys are leaving? 14:12:53

19 A. No, I don't know. 14:12:55

20 Q. And other than the voices, did you recognize 14:12:57

21 any of the individuals -- 14:12:59

22 A. No. 14:13:00

23 Q. -- that were shown in this video? 14:13:00

24 A. I can't tell without seeing their face, no. 14:13:04

25 14:13:04

1 Q. What did you mean by that? 14:16:15

2 A. Well, that whole thing right there hassling, 14:16:17

3 I just kind of fibbed that up. It's kind of like, I 14:16:21

4 just wanted to discourage people, outsiders coming in 14:16:25

5 with no etiquette that take, that type. 14:16:29

6 So, I hear about all of these rumors people 14:16:33

7 getting punched in the magazine. Cars getting 14:16:36

8 vandalized, like I read it in the papers or 14:16:39

9 something, right, but that's all B.S. 14:16:43

10 I've never seen cars get vandalized. 14:16:45

11 I've never seen guys get punched in the 14:16:48

12 30 years surfing there, not once. 14:16:51

13 I've never seen a guy get laid his hands on, 14:16:53

14 all of this stuff comes out. So, to me like my thing 14:16:55

15 I like to keep it with like people come out, but they 14:16:59

16 need to be respectful of the etiquette and stuff like 14:17:04

17 that, keep it in order. 14:17:09

18 So, if people think that all of that stuff 14:17:11

19 happens, I'm going to tell them, yeah, this stuff 14:17:13

20 happens. It's kind of like, yeah. So, that's why I 14:17:16

21 said that. 14:17:21

22 Q. You try to intimidate and deter people from 14:17:21

23 coming out to Lunada Bay? 14:17:25

24 A. No. 14:17:27

25 MR. CROWLEY: Objection, argumentative, 14:17:27

1 punched back. And that was the only time. So, Brant 14:24:07  
2 didn't start it. Andy started it. 14:24:10  
3 MR. CROWLEY: She didn't ask that. She asked 14:24:13  
4 if that was the only time. 14:24:15  
5 THE WITNESS: Yeah. That's the only time 14:24:16  
6 that I seen him punch. 14:24:18  
7 BY MS. POOLEY: 14:24:20  
8 Q. So, when you said on the video, there are 14:24:20  
9 still fights down here, that wasn't true; is that 14:24:22  
10 correct? 14:24:24  
11 A. No, no, no. 14:24:24  
12 Q. That's correct, it wasn't true? 14:24:25  
13 A. It wasn't true. 14:24:26  
14 Q. And when you said, people will just fucking 14:24:27  
15 duke it out, that's not true, also? 14:24:31  
16 A. I've never seen it. 14:24:33  
17 Q. Was it true when you said that? 14:24:34  
18 A. Yeah, I've never seen a fight. So, yeah, 14:24:36  
19 well, what I said was that they still do it, but it's 14:24:39  
20 not true. I've never seen a person laying a hand on 14:24:43  
21 another person down there. 14:24:48  
22 Q. But you were saying these things that were 14:24:50  
23 not true -- 14:24:53  
24 A. Yeah. 14:24:54  
25 Q. -- to this individual to deter him from 14:24:55

1 surfing at Lunada Bay; is that correct? 14:24:57

2 A. Well, not so much deter, but it's just like 14:24:59

3 they asked me. And that's what the public thinks 14:25:03

4 when you read stuff, magazines and whatever. And 14:25:06

5 they say that all this stuff. So, I figured I'll 14:25:09

6 just go with the story. 14:25:12

7 Q. Why? 14:25:14

8 A. Yeah, because it kind of discourages people 14:25:15

9 whatever, maybe. 14:25:19

10 Q. So, you were saying these things that were 14:25:20

11 not true to discourage people from coming to Lunada 14:25:25

12 Bay and surfing; is that correct? 14:25:29

13 MR. CROWLEY: Over broad, incomplete 14:25:32

14 hypothetical. 14:25:34

15 THE WITNESS: Yeah, yeah. 14:25:35

16 BY MS. POOLEY: 14:25:37

17 Q. Yes? 14:25:37

18 A. Yes, blow up what has already been blown up. 14:25:38

19 I wasn't going to. 14:25:43

20 Q. Okay. The reason was to discourage people 14:25:45

21 from coming to Lunada Bay and surfing; is that 14:25:48

22 correct? 14:25:49

23 A. Yeah. 14:25:49

24 MR. CROWLEY: Same objection. 14:25:49

25 THE WITNESS: Yeah. 14:25:51

1 MR. CROWLEY: Objection, lacks foundation, 14:37:13  
2 calls for speculation. You can answer if you know. 14:37:14  
3 THE WITNESS: It's just, it's not when you 14:37:19  
4 say burning them, it sounds bad, but sometimes locals 14:37:22  
5 do it to locals. 14:37:26  
6 It's like a joke kind of thing, you know, but 14:37:27  
7 it's not meant as like when you say burn, oh, I'm 14:37:30  
8 going to ruin this, no, because Lunada Bay people 14:37:34  
9 that surf there regularly everyone pretty much knows 14:37:39  
10 where they sit. 14:37:43  
11 There's a pecking order. And no one really 14:37:44  
12 goes beyond that so. 14:37:47  
13 BY MS. POOLEY: 14:37:49  
14 Q. I'm not sure that you answered my question. 14:37:50  
15 My question really was who have you seen burn 14:37:52  
16 someone on a wave at Lunada Bay? 14:37:56  
17 MR. CROWLEY: Same objections. 14:37:59  
18 THE WITNESS: Um, not lately. Everyone is 14:38:01  
19 pretty much in order. 14:38:08  
20 BY MS. POOLEY: 14:38:09  
21 Q. My question was not specific to lately. 14:38:10  
22 A. Yeah. 14:38:13  
23 Q. My question is broader than that. 14:38:13  
24 A. Yeah, I'm trying to, oh, I'm trying to 14:38:16  
25 remember. I know that it happens, but I can't name 14:38:21

1 it. Sorry. 14:38:23

2 Q. As you sit here today, you can't think of one 14:38:24

3 other person -- let me finish my question. 14:38:27

4 As you sit here today, you can't think of one 14:38:29

5 other person who ever intentionally burned someone on 14:38:31

6 a wave at Lunada Bay; is that correct? 14:38:35

7 MR. CROWLEY: Same objections. 14:38:37

8 THE WITNESS: Yeah. 14:38:38

9 BY MS. POOLEY: 14:38:40

10 Q. Now, you said that there was a pecking order 14:38:40

11 at Lunada Bay; correct? 14:38:45

12 A. Uh-huh. 14:38:49

13 Q. And what is the order? 14:38:49

14 A. There really it's just people that have been 14:38:54

15 there longer. 14:38:57

16 Q. Who is at the top of the pecking order? 14:38:58

17 A. I don't know. That would be -- it's a hard 14:39:00

18 thing because someone might think he is. Someone 14:39:06

19 might think they are. 14:39:10

20 There's no real one person who is at the top 14:39:11

21 of the pecking order. That could be anybody who was 14:39:14

22 there longer than me. There's no one person. 14:39:18

23 Q. So, the pecking order is just you and 14:39:19

24 everybody who has been there before you, there's just 14:39:22

25 two levels to the pecking order? 14:39:26

1 A. There's the people that have been there, and 14:39:27  
2 between those people there are people who was there 14:39:30  
3 first kind of, the older people. 14:39:32

4 Q. And based on your knowledge and experience -- 14:39:35

5 A. Uh-huh. 14:39:37

6 Q. -- from your perspective -- 14:39:37

7 A. Yeah. 14:39:39

8 Q. -- who is at the top of the pecking order at 14:39:39  
9 Lunada Bay? 14:39:44

10 MR. CROWLEY: Objection, incomplete 14:39:46  
11 hypothetical. 14:39:48

12 THE WITNESS: Right now? 14:39:48

13 BY MS. POOLEY: 14:39:49

14 Q. Sure. 14:39:50

15 MS. BACON: No foundation. 14:39:51

16 THE WITNESS: It's hard to say. Let's say 14:39:52  
17 even like Frankie Ferrara, if he came out he would 14:39:54  
18 be, but he has not surfed in a long time, or even 14:39:58  
19 like Brant or Joe. 14:40:02

20 BY MS. POOLEY: 14:40:07

21 Q. Brant Blakeman and Joe -- 14:40:08

22 A. Bark or even like Zen Del Rio. Just like any 14:40:10  
23 guys older than me that I respect. And I have been 14:40:15  
24 there a long time. 14:40:20

25 Q. So, those four that you just named are guys 14:40:21

1 A. I think it was on Yarmouth, possibly it was 14:53:16  
2 like a long time ago that I think it was for a 14:53:20  
3 rolling stop. 14:53:25

4 Q. Do you believe that there's localism at 14:53:32  
5 Lunada Bay? 14:53:53

6 MR. CROWLEY: Objection, vague and ambiguous. 14:53:54

7 THE WITNESS: I don't know anything localism. 14:53:57  
8 There's maybe a little bit, kind of. 14:54:00

9 BY MS. POOLEY: 14:54:05

10 Q. And why do you say that? 14:54:06

11 A. Because people get heckled and I heckle 14:54:07  
12 people. So, I guess you would consider that 14:54:11  
13 localism. I don't know. 14:54:14

14 Q. And people that get heckled are the non-local 14:54:17  
15 outsider folks? 14:54:23

16 A. Not always. We heckle our own people, too, 14:54:24  
17 just as a joke. I get heckled if I fall on a wave. 14:54:27  
18 They will yell at me and call me a kook. 14:54:32

19 Q. So, how is it that heckling people is 14:54:35  
20 localism at Lunada Bay? 14:54:42

21 MR. CROWLEY: Objection, that's vague and 14:54:45  
22 ambiguous. 14:54:46

23 THE WITNESS: I don't know that. 14:54:47

24 I'm just telling you that I'm guessing if you 14:54:48  
25 think heckling is some part of localism. 14:54:51



1 A. Well, I feel that, because I wasn't very good 16:01:11  
2 so, you know. I had to earn it. I earned it, you 16:01:18  
3 know, I feel like. 16:01:23

4 Q. And how did you earn it? 16:01:23

5 A. Because years of just not open, just keeping 16:01:25  
6 my mouth shut, being respectful. People might drop 16:01:30  
7 in on me at the beginning. And I was just happy to 16:01:35  
8 be there, you know. 16:01:39

9 Q. Do you know John MacHard? 16:01:40

10 A. Yeah. 16:01:43

11 Q. How do you know him? 16:01:43

12 A. I've known him since high school. 16:01:45

13 Q. Is he older than you or the same age? 16:01:47

14 A. No. He's a little older. He's a little 16:01:52  
15 older. 16:01:56

16 Q. And did you ever pour beer on his head? 16:01:58

17 A. I did. 16:02:02

18 Q. When did you do that? 16:02:03

19 A. One day at the Bay out on the patio. 16:02:05

20 Q. And why did you do that? 16:02:10

21 A. He had just come in from surfing. And I was 16:02:11  
22 on the patio on the wall, perimeter wall. And we 16:02:15  
23 were talking. 16:02:22

24 And he kind of got in a conversation of how, 16:02:22  
25 you know, this place should be open to everyone. And 16:02:25

1 BY MS. POOLEY: 16:11:13

2 Q. You don't think of anyone else as a pirate? 16:11:13

3 A. No. I don't know. 16:11:17

4 Q. You only think of yourself as a pirate? 16:11:19

5 A. Well, it's kind of, yeah. I can't really, 16:11:23

6 it's kind of a weird thing. I don't know. 16:11:33

7 Q. Is it correct that in your mind you're the 16:11:34

8 only pirate -- 16:11:38

9 A. No, no -- 16:11:39

10 Q. -- as a surfer at Luna Bay; is that correct? 16:11:40

11 MR. CROWLEY: Let her finish. 16:11:43

12 THE WITNESS: -- no, because I would think 16:11:45

13 that people that surf there are pirates I would, but 16:11:46

14 to some of them or most of them, I don't know. They 16:11:52

15 might not think that. 16:11:55

16 BY MS. POOLEY: 16:11:56

17 Q. I'm just asking what you think. 16:11:57

18 Who do you think of as the pirates who surf 16:11:58

19 at Lunada Bay, other than yourself? 16:12:02

20 A. I think just people like that surf there 16:12:04

21 regularly kind of. 16:12:08

22 Q. And who are those people? 16:12:09

23 A. Just like Charlie Mowatt, like Andy Patch. 16:12:11

24 Q. Andy Patch? 16:12:24

25 A. And Brad Ringer. 16:12:26

1	Lunada Bay?	16:32:38
2	A. Absolutely not.	16:32:39
3	Q. What about preventing persons from surfing at	16:32:40
4	Lunada Bay?	16:32:43
5	A. Absolutely not.	16:32:44
6	Q. Have you ever had any communications with	16:32:45
7	Charlie Ferrara about preventing any person from	16:32:47
8	surfing at Lunada Bay?	16:32:49
9	A. Absolutely not.	16:32:50
10	Q. Have you ever had any communications with	16:32:50
11	Charlie Ferrara about preventing any persons from	16:32:52
12	visiting Lunada Bay?	16:32:54
13	A. Absolutely not.	16:32:56
14	Q. Have you ever witnessed Charlie Ferrara ever	16:32:58
15	attempt to prevent somebody from visiting Lunada Bay?	16:33:18
16	A. Absolutely not.	16:33:22
17	Q. And what about surfing at Lunada Bay?	16:33:23
18	A. Absolutely not.	16:33:25
19	Q. The same questions for Frank.	16:33:27
20	Have you ever witnessed Frank ever try to	16:33:27
21	attempt to prevent anybody from surfing at Lunada	16:33:29
22	Bay?	16:33:30
23	A. Absolutely not.	16:33:30
24	Q. What about visiting Lunada Bay?	16:33:32
25	A. Absolutely not.	16:33:35

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20 UNITED STATES DISTRICT COURT  
21 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
22

23 CORY SPENCER, an individual;  
24 DIANA MILENA REED, an  
individual; and COASTAL  
25 PROTECTION RANGERS, INC., a  
26 California non-profit public benefit  
corporation,

27 Plaintiffs,  
28

CASE NO. 2:16-cv-02129-SJO (RAOx)

PLAINTIFFS' NOTICE OF  
DEPOSITION OF DEFENDANT  
SANG LEE

Complaint Filed: March 29, 2016  
Trial Date: November 7, 2017

Case No. 2:16-cv-02129-SJO (RAOx)



1  
2 v.

3 LUNADA BAY BOYS; THE  
4 INDIVIDUAL MEMBERS OF THE  
5 LUNADA BAY BOYS, including but  
6 not limited to SANG LEE, BRANT  
7 BLAKEMAN, ALAN JOHNSTON  
8 AKA JALIAN JOHNSTON,  
9 MICHAEL RAE PAPAYANS,  
10 ANGELO FERRARA, FRANK  
11 FERRARA, CHARLIE FERRARA,  
12 and N. F.; CITY OF PALOS  
13 VERDES ESTATES; CHIEF OF  
14 POLICE JEFF KEPLEY, in his  
15 representative capacity; and DOES  
16 1-10,

17 Defendants.

18  
19  
20 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

21 Please take notice that on May 31, 2017, at 9:00 a.m., Plaintiffs Cory  
22 Spencer, Diana Milena Reed, and the Coastal Protection Rangers, Inc.  
23 ("Plaintiffs") will take the deposition of Sang Lee at TechSpace, 3420 Bristol  
24 Street, 6th Floor, Costa Mesa, CA 92626. The deposition will be taken from  
25 day to day thereafter until completed.

26 NOTICE IS FURTHER GIVEN that the deposing party intends to  
27 cause the proceedings to be recorded stenographically through the instant

28 ///

///

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///



1 visual display of the testimony and will also be recorded by videotape and  
2 audiotape.

3  
4 DATED: May 19, 2017

HANSON BRIDGETT LLP

5  
6  
7 By: 

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RANGERS, INC.

**PROOF OF SERVICE**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of San Francisco, State of California. My business address is 425 Market Street, 26th Floor, San Francisco, CA 94105.

On **May 19, 2017**, I served true copies of the following document(s) described as:

**PLAINTIFFS' NOTICE OF DEPOSITION  
OF DEFENDANT SANG LEE**

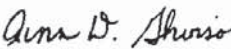
on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the address(es) listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Hanson Bridgett LLP's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on **May 19, 2017**, at San Francisco, California.

  
Ann D. Ghiorso

SERVICE LIST

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USDC, Central District of California, Case No. 2:16-cv-02129-SJO (RAOx)

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(Attorneys for Defendants FRANK  
FERRARA and CHARLIE FERRARA)

Tel: 949.221.1000

Fax: 949.221.1001

E-Mail: ahurley@bremerwhyte.com  
tbacon@bremerwhyte.com

**From:** Sang Lee  
**To:** John Camplin; ringersurfboards@[REDACTED]; roxygwen@[REDACTED]; cmowat@[REDACTED]; colm31136@[REDACTED]; lbcontrolagency@[REDACTED]; davemelo2002@[REDACTED]; yoakswagon@[REDACTED]; derek.debraal@[REDACTED]; ericbinz@[REDACTED]; geoff.dsena@[REDACTED]; gjehelkas@[REDACTED]; jayduston@[REDACTED]; joe@[REDACTED]; patchman@[REDACTED]; arthurrozzi@[REDACTED]; me.griep@[REDACTED]; mpaps@[REDACTED]; woodyris@[REDACTED]; peterb@[REDACTED]; credondobeach@[REDACTED]; renocaldwel@[REDACTED]; ssfairbro@[REDACTED]; sullymusic@[REDACTED]  
**Sent:** 1/8/2011 6:42:20 PM  
**Subject:** Re: bible

sorry , john i thought u wrote it but it was ur brother dave ( i still love all u camplins ) ..... i looked up my contact n it was late at night ( pass midnite / i think i had insomnia because i was soooooo flustered n i quit burnning a few day ago to clear out my lungs n i was sure i read ur name ..... i know i was wrong ..... SORRY john / i was actually quite hurt when i thought it was u because i have highest up most respect for u ..... SORRY again for thinking it was u ..... my bad ..... love u like my older brother john / through thick n thin ..... n dave , i love u also but my feelings towards this issue still stands ..... as long as i live on this earth i will do everything i can to preserve the magic of that we have in our backyard ..... love u all sang .....

**From:** John Camplin  
**To:** Sang Lee ; ringersurfboards@[REDACTED]; roxygwen@[REDACTED]; cmowat@[REDACTED]; colm31136@[REDACTED]; lbcontrolagency@[REDACTED]; davemelo2002@[REDACTED]; yoakswagon@[REDACTED]; derek.debraal@[REDACTED]; ericbinz@[REDACTED]; geoff.dsena@[REDACTED]; gjehelkas@[REDACTED]; jayduston@[REDACTED]; joe@[REDACTED]; patchman@[REDACTED]; arthurrozzi@[REDACTED]; me.griep@[REDACTED]; mpaps@[REDACTED]; woodyris@[REDACTED]; peterb@[REDACTED]; credondobeach@[REDACTED]; renocaldwel@[REDACTED]; ssfairbro@[REDACTED]; sullymusic@[REDACTED]  
**Sent:** Sat, January 8, 2011 6:02:05 PM  
**Subject:** Re: bible

Sanger,  
Didn't write it. If I did I would of signed my name.  
Just curious why you assumed it was me?  
John C  
PS. It's all about Passion and you got it Bro. Yea!

Sent from my Samsung Epic™ 4G

Sang Lee <sangdangdoodle@[REDACTED]> wrote:

>wow john c. i cant believe u wrote this ..... why  
>????????????????? u know how much i care for our home n everyone that deserves  
>to be here ..... john , u got to know me pretty well from living with  
>ur brother dave ( all the good times n bad times we've been through (the tragic  
>times also ) n u know i will be there for all my friends ( that deserves it )  
>..... i would give the shirt off my back or the last piece of bread on the  
>table for u ..... u know , i am who i am ( with the terms of being a  
>solid person , friend n a pirate ) because i was brought up this way by u guys (   
>the older boys ( not the fluffy powder puff ones but the real solid  
>ones...../ u guys made up the rules n term of engagement n I WILL DIE  
>BY THESE RULES ..... I DONT UNDERSTAND WHY ALL OF SUDDEN UR CHANGING  
>EVERYTHING FOR THE WORSE ..... so u dont mind if troy ( buffalo head )  
>back paddles jesse or kailee ..... ??????????????/ u know what we  
>have here in our backyard is priceless n u cant put a price on it .....  
>john I LOVE U AS A OLDER BROTHER but i have to totally disagree with u 100%  
>..... i want to keep the bay sacred like its suppose to be  
>..... these takers dont do shittttttttttttttttttt ..... they





#13403

>dont even pick up trash or anything like that ..... as we all  
>get older n have different priorities now than before such as making ends meet  
>or trying to make money maybe u forgot the rules u guys made up ??????????????  
>fuck all the takers ..... they arent getting nothing from me  
>..... especially my respect ..... i was  
>taught long time ago "to earn respect ONE HAS TO GIVE RESPECT " n those takers  
>dont give a shit ..... all they do is take ..... prime  
>example / u remember that one time at ta's that friend of urs ( the rich one  
>with all the money ) that came down with jesse ..... n u said he was a nice  
>guy ( the one who had the house at the bay ) but that dick was trying to drop  
>in on everyone out there including KAILEE ..... u want those type of  
>people to be around the hill ?????????????????? john , i am not a rich person  
>, all i have is my word , my good friends ( who back me up 110 % n not 98 % ) ,  
>i am not going to have a mansion on the cliff or drive a \$ 100,000 car but what  
>i have is priceless ( those fuckn rich a holes or takers will never have  
>..... ) . this place has given me soooooooooo much i cant even start  
>..... ( good friends ..... priceless  
>..... this is no clickidy ( M. beach type bull shit  
>). ..... this place has so much soul ones has to be inside to really  
>realize what we have ..... my god john our brothers n our loved ones  
>ashes are out there ..... i hope when i die i want to be there  
>also..... this place is not just a surf spot  
>..... its our home john n i am not going to share it with  
>people who r selfish n not understanding of their surroundings  
>..... u know im no bull shitter , i try to be there for my  
>friends n family ( i actually think im a pretty solid person as far as being  
>solid person ) n our home RUNS DEEP IN MY VEINS ..... i care  
>more about this place than a lot of people because i know how special it is  
>..... n u know what john all these takers that people say " oh , his a  
>nice guy or whatever / thats total bullshit / nice guy to them but what have  
>they done for the hill or the bay ?????????????????? NOTHING .....  
>they just come n TAKE ..... fuck im over it , starting with  
>nickel head ..... ( n i will tell that to zen right in front of  
>him ) ..... i might not have surfed here when u guys were ruling the  
>place in the 70's but my feelings n love for our home runs DEEP INSIDE MY HEART  
>..... N NOTHINGS GOING TO CHANGE THAT NOTHING  
>( NOT EVEN UR OPINION ) ..... i still love u as a  
>brother n I ALWAYS WILL NO MATTER WHAT ..... hey , im not perfect  
>nobody is ..... i just want to keep our home the way it should be  
>kept ( nice n clean with no takers ) ..... john do u know after ur  
>brothers funeral i was like born again ..... i realized that this  
>place is so special because it brings those special people together as one (   
>thats when i decided to get the ink on my back ) ..... i say  
>these things about certain people not because im an asshole ( maybe a few people  
>might think so ) but because i DONT WANT THE MAGIC TO DISAPPEAR  
>..... still love u john  
>  
>  
>  
>  
>

>From: Sang Lee <sangdangdoodle@>

>To: ringersurfboards@; roxygwen@; cmowat@;

>colm31136@; lbcontrolagency@; davemelo2002@;

>yoakswagon@; derek.debraal@; ericbinz@;

>geoff.dsena@; gjehelkas@; jayduston@;

>joe@; jc2332@; patchman@; arthurrozzi@;

>me.griep@; mpaps@; woodyris@; peterb@;

>credondobeach@; renocaldwell@; ssfairbro@;

>sullymusic@;

>Sent: Fri, January 7, 2011 10:13:52 PM

>Subject: bible

>

>  
>ok people , someone sent an e-mail to chach about love , bible versus and  
>quotes on how we should all just get along with one another.....  
>what a joke ..... to whoever wrote this " ur a f\*\*\*n JOKE for  
>trying to bring religion into the surf culture scene ..... this culture  
>isnt just here in our backyard ..... its everywhere in the world  
>..... ur such a holy person for saying what ur saying ( u dont  
>even have the balls to say ur name ..... so u write it under  
>lbcontrol agency / what a joke ..... u should write this under  
>lbtrollagency ..... yeah thats uuuuuuuuuuuuuuuuuuu ..... what u  
>think because u know some sentences from the bible makes u special  
>..... well than go surf somewhere else ..... why then  
>do u surf in a place where there's all these things happen that goes on  
>..... ur basically reaping off the surf culture that u r so  
>against ..... if u want to voice ur opinion about this subject  
>man up n come out n talk in person ..... not hiding behind ur computer  
>keyboard ..... if u do i would respect u a little more ( very  
>little ) ..... havent u heard the saying " AS LONG AS  
>THERES RELIGION IN THIS WORLD THERE WILL BE WAR ..... ur  
>holliness.....  
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>  
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>

From: Sang Lee  
To: ringersurfboards@[REDACTED]; roxygwen@[REDACTED]; cmowat@[REDACTED];  
colm31136@[REDACTED]; lbcontrolagency@[REDACTED]; davemelo2002@[REDACTED];  
yoakswagon@[REDACTED]; derek.debraal@[REDACTED]; ericbinz@[REDACTED]; geoff.dsena@[REDACTED];  
gjehelkas@[REDACTED]; jayduston@[REDACTED]; joe@[REDACTED]; jc2332@[REDACTED];  
patchman@[REDACTED]; arthurrozzi@[REDACTED]; me.griep@[REDACTED]; mpaps@[REDACTED];  
woodyris@[REDACTED]; peterb@[REDACTED]; credondobeach@[REDACTED]; renocaldwell@[REDACTED];  
ssfairbro@[REDACTED]; sullymusic@[REDACTED]  
Sent: 1/10/2011 5:58:45 PM  
Subject: Re: bible

hi fellow friends , its me again ( this will be my last posting on this subject / i hope ) ..... i just want to say one thing ..... i really appreciate all the positive feedbacks i've recieved but i just want to clear one thing up . i just want us ( locals ) to police ourselves not just with outsiders ( not condonning violence / do NOT want to see my friends get in trouble with the law / theres other options to deterr outsiders from surfing our home such as we can ride together or its a long walk up the trail in bare feet ..... etc ..... ) i dont want people so fired up on trolls because of these e-mails n immediately getting into fights or threatenning the outsiders n getting into trouble . believe me its a TOTAL BUMMER to go to jail or go to court over threats ( i went through it with that dick head / todd clark / costed me a lot of money n 5 years restraining order put on me / it sucked / do not want my friends to go through what i went through ) THERES OTHER OPTIONS THAN THREATS N VIOLENCE TO MAKE THEIR TIME IN OUR HOME A BUMMER but if they just get violent with us first than its on ..... we just need to police among ourselves by being respectful toward the local homeowners such as / dont make butt on the cliff / dont park in front of their mail boxes , pick up trash ..... etc. trust me my friends these little things we can do will make our home a better place n gain respect from people ..... thanks for ur support ..... n nickel head / i am going to deal with him personally ..... love u all .....

**From:** Sang Lee  
**To:** ringersurfboards@[REDACTED]; roxygwen@[REDACTED]; cmowat@[REDACTED]; colm31136@[REDACTED]; lbcontrolagency@[REDACTED]; davemelo2002@[REDACTED]; yoakswagon@[REDACTED]; derek.debraal@[REDACTED]; ericbinz@[REDACTED]; geoff.dsena@[REDACTED]; gjehelkas@[REDACTED]; jayduston@[REDACTED]; joe@[REDACTED]; jc2332@[REDACTED]; patchman@[REDACTED]; arthurrozzi@[REDACTED]; me.griep@[REDACTED]; mpaps@[REDACTED]; woodyris@[REDACTED]; peterb@[REDACTED]; credondobeach@[REDACTED]; renocaldwell@[REDACTED]; ssfairbro@[REDACTED]; sullymusic@[REDACTED]  
**Sent:** Fri, January 7, 2011 10:13:52 PM  
**Subject:** bible

ok people , someone sent an e-mail to chach about love , bible versus and quotes on how we should all just get along with one another..... what a joke ..... to whoever wrote this " ur a f\*\*\*n JOKE for trying to bring religion into the surf culture scene ..... this culture isnt just here in our backyard ..... its everywhere in the world ..... ur such a holy person for saying what ur saying ( u dont even have the balls to say ur name ..... so u write it under lbcontrol agency / what a joke ..... u should write this under lbtrollagency ..... yeah thats uuuuuuuuuuuuuuuuuuuuu ..... what u think because u know some sentences from the bible makes u special ..... well than go surf somewhere else ..... why then do u surf in a place where there's all these things happen that goes on ..... ur basically reaping off the surf culture that u r so against ..... if u want to voice ur opinion about this subject man up n come out n talk in person ..... not hiding behind ur computer keyboard ..... if u do i would respect u a little more ( very little ) ..... havent u heard the saying " AS LONG AS THERES RELIGION IN THIS WORLD THERE WILL BE WAR ..... ur holliness.....





----- Forwarded Message -----

Lee 00000591

**From:** Charlie Mowat  
**To:** Sang Lee  
**CC:** andy patch; brad ringer; charlie beukema; pete babros; john cohen; john camplan; chris; colm; ray warner; reno caldwell; dave melo; dave yoakley; derek debraal; geoff dsena; mark griep; mike kent; paul woodward; zen rio  
**Sent:** 1/16/2014 3:26:56 PM  
**Subject:** Re: Fw: problems on monday

I will be on the patio allllllllll day on Monday throwing out heckles and sporting a BBQ. I'm already warming up.  
Don't miss the fun

On Thu, Jan 16, 2014 at 3:00 PM, Sang Lee <sangdangdoodle@[REDACTED]> wrote:

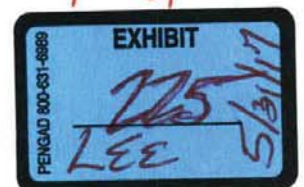
On Thursday, January 16, 2014 9:43 AM, "sully@[REDACTED]" <sully@[REDACTED]> wrote:  
Sang please forward this message to the whole crew so everyone knows and we can all be on the same page  
thanks  
sully

----- Original Message -----

**Subject:**  
**From:** Zach Stafford <zachjamesstafford@[REDACTED]>  
**Date:** Wed, January 15, 2014 11:50 pm  
**To:** "sully@[REDACTED]" <sully@[REDACTED]>

[http://www.facebook.com/l.php?u=http%3A%2F%2Fwww.reddit.com%2Fr%2Fsurfing%2Fcomments%2F1vaprb%2Fmonday+january+20th+lunada+bay+br+h=4AQGaT\\_AC](http://www.facebook.com/l.php?u=http%3A%2F%2Fwww.reddit.com%2Fr%2Fsurfing%2Fcomments%2F1vaprb%2Fmonday+january+20th+lunada+bay+br+h=4AQGaT_AC)

Sent from my iPhone

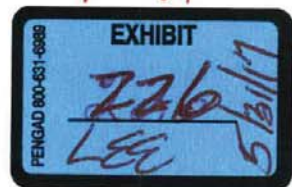




**From:** Charlie Mowat  
**To:** andy patch; sangdangdoodle .; Paul Woodward; sully@[REDACTED] pete babros;  
peterb@[REDACTED]; dave yoak  
**Sent:** 1/17/2014 6:45:57 AM  
**Subject:** Mano

Stuff's coming bros. I should be back Sunday and have all next week off. Hope you're off Monday for the fiasco.  
I'm going to sponsor a BBQ and be on the patio all day.

[http://www.surflife.com/surflife/forecasts4/forecast\\_vbgst.cfm](http://www.surflife.com/surflife/forecasts4/forecast_vbgst.cfm)



**From:** Sang Lee  
**To:** yoakswagon@[REDACTED]; davemelo2002@[REDACTED]; cmowat@[REDACTED];  
geoff.dsena@[REDACTED]; derek.debraal@[REDACTED]; patchman@[REDACTED];  
ringersurfboards@[REDACTED]; sullymusic@[REDACTED]; feeogle@[REDACTED]; renocaldwell@[REDACTED];  
peterb@[REDACTED]; me.griep@[REDACTED]; mkent@[REDACTED]; 4bacons@[REDACTED];  
woodyris@[REDACTED]; credondobeach@[REDACTED]; jc2332@[REDACTED]; mpaps@[REDACTED];  
colm31136@[REDACTED]; ssfairbro@[REDACTED]; zendelric@[REDACTED]; dj90274@[REDACTED];  
joe@[REDACTED]; cstrong@[REDACTED]; OISusana@[REDACTED]; jcbeukema@[REDACTED];  
**Sent:** 1/17/2014 5:37:28 PM  
**Subject:** surfing monday

everyone we should all try to surf this coming Monday ..... don't get in trouble but just  
surf .....

